UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 02 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7647 3439
RETURN RECEIPT REQUESTED

Mr. Joseph Urban
Environmental, Health, and Safety Manager
Rust-Oleum Corporation
8105 95th Street
Pleasant Prairie, Wisconsin 53158

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID Number: WID988575452

Dear Mr. Urban:

On June 23, 2016, a representatives of the U.S. Environmental Protection Agency inspected the Rust-Oleum Corporation ("ROC") located in Pleasant Prairie, Wisconsin. As a large quantity generator of hazardous waste, ROC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate ROC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ROC, EPA's review of records pertaining to ROC, and the inspector's observations, EPA has determined that ROC has unlawfully stored hazardous waste without a license or interim status as a result of ROC's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirement(s) violated by ROC as of the date of the inspection in paragraphs 1- 8 below.

Also, EPA has determined that ROC violated RCRA requirements related to universal waste as described in paragraph 9, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, ROC violated the following large quantity generator license exemption requirements:

1. Hazardous Waste Tank Labeling Requirements

A large quantity generator must ensure that tanks holding hazardous waste are labeled with the words "Hazardous Waste." See Wis. Admin. Code §§ NR 662.034(1)(c) [40 C.F.R. § 262.34(a)(3)].
Tank 153 is used for storing spent cleaning solvents prior to distillation. This tank was not labeled as "Hazardous Waste" at the time of the inspection.

Note: ROC provided to EPA for review a Notice of Noncompliance (NON) issued by the Wisconsin Department of Natural Resources (WDNR) on April 3, 2013. In this NON, the WDNR inspector noted the following: "The tank, hard piped into the still, is exempt as part of the recycling process..." EPA does not agree with this determination, and is requesting information regarding the tank system associated with the distillation unit in items 1 through 5 of this Notice.

2. Hazardous waste Tank System Secondary Containment Requirements

A large quantity generator, under Wis. Admin. Code § NR 662.034(1)(a)2. [40 C.F.R. § 262.34(a)(1)(ii)], must provide secondary containment for existing tank systems that store hazardous wastes in accordance with Wis. Admin. Code § NR 665.0193 [40 C.F.R. § 265.193]. Specifically, secondary containment systems must be designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during the use of the tank system. See, Wis. Admin. Code § NR 665.0193(2)(a) [40 C.F.R. § 265.193(b)(1)].

At the time of the inspection, ROC was managing hazardous waste in one outdoor and one indoor area. The outdoor area held solvent-based hazardous waste tanks PWT-1 and SCT-2, as well as tank SCT-1, which held a high pH secondary material that was to be directly reused in an off-site waste water treatment plant. The indoor containment held solvent-based waste tank 153. The containment for these areas did not appear to be lined or coated to prevent the migration of liquids, due to the permeability of concrete, out of the containment.

3. Design and Installation of New Tank System Components

A large quantity generator who installs new tank system components must obtain a written assessment reviewed and certified by a qualified Professional Engineer attesting that the system has sufficient structural integrity and is acceptable for storing hazardous waste. The assessment must include design standards according to which the ancillary equipment is or will be constructed and the hazardous characteristics of the waste(s) to be handled. See, Wis. Admin Code §§ NR 662.034(1)(a)2. and 665.0192(1)(a) and (b) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192(a)(1) and (2)].

At the time of the inspection, Mr. Lambert stated that a pump and its associated piping was newly installed beneath hazardous waste tank SCT-2. An assessment for this new ancillary component was not available for review.

4. Air Emission Standards for Equipment Leaks – Subchapter BB

In accordance with Wis. Admin. Code § NR 662.034(1)(a)2.; 665.1050 [40 C.F.R. § 262.34(a)(1)(ii); 265.1050], a large quantity generator who uses a tank system to store hazardous waste with organic concentrations of at least 10 percent by weight, must determine the applicability of Wis. Admin. Code chapter 665, subchapter BB [40 C.F.R. part 265, subpart BB] for air emission leaks from equipment. Equipment is defined under Wis. Admin. Code § NR 664.1031 [40 C.F.R. § 264.1031] and means each valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange or other connector, and any control devices or systems required by this subpart.

At the time of the inspection, ROC had not determined the applicability of subchapter BB for the equipment associated with tanks SCT-2, PWT-1, or T-153, and had not prepared records of compliance specific to this subchapter. EPA recognizes that ROC does, however, conduct a Method 21 leak detection and repair (LDAR) program at the facility on an annual basis, and that some of the components which may be subject to subchapter BB are marked with identification tags.

EPA is requesting ROC determine the applicability of subchapter BB to the solvent reclamation system. Explain your determination. If you determine subchapter BB is applicable, please provide records of past compliance for the years 2014 through 2016, if available, or a plan for future compliance to support your response.

5. Air Emission Standards for Tanks – Subchapter CC

In accordance with Wis. Admin. Code § NR 662.034(1)(a)2.; 665.1080 [40 C.F.R. § 262.34(a)(1)(ii); 265.1080], a large quantity generator who uses a tank system to store hazardous waste with an average volatile organic concentration of at least 500 parts per million by weight, must determine the applicability of Wis. Admin. Code chapter 665, subchapter CC [40 C.F.R. part 265, subpart CC] for air emission standards for the tank. Under Wis. Admin. Code § NR 665.1090(2) [40 C.F.R. § 265.1090(b)], the generator who uses air emission controls in accordance with Wis. Admin. Code § NR 665.1085 [40 C.F.R. § 265.1085] shall prepare and maintain records of compliance.

At the time of the inspection, ROC had not determined the applicability of subchapter CC for the tanks SCT-2, PWT-1, or T-153, and had not prepared records of compliance specific to this subchapter. EPA recognizes that ROC conducts inspections of the tank and the associated control equipment at least annually.

EPA is requesting ROC determine the applicability of subchapter CC to the solvent reclamation system tanks PWT-1, SCT-2 and T153. Explain your determination. If you determine subchapter CC is applicable, please provide records of past compliance for the years 2014 through 2016, if available, or a plan for future compliance to support your response.

6. 90-Day Container Labeling

Under Wis. Admin. Code § NR 662.034(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator who stores hazardous waste in a 90-day container must mark the start date of accumulation on that container.

At the time of the inspection, ROC failed to mark the start date of accumulation on one container located on the second floor of the mixing area.

Note: The container was marked with a start date of accumulation at the time of the inspection. No further action is requested to address this violation.

7. Use and Management of Satellite Containers

Under Wis. Admin. Code §§ NR 662.034(3)(a)1. and 665.0173(1) [40 C.F.R. §§ 262.34(c)(1)(i) and 265.173(a)], a large quantity generator who stores waste in satellite accumulation areas must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, ROC failed to close one 55-gallon drum of paint-related waste on the first floor of the mixing area.

Note: The container was closed at the time of the inspection. No further action is requested to address this violation.

8. Personnel Training Requirements

A large quantity generator of hazardous waste must do the following, *inter alia*, with respect to personnel training:

- Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches hazardous waste management procedures and contingency plan implementation. An annual review of this program is also required. See, Wis. Admin. Code §§ NR 665.0016(1)(a) – (d), and (3) [40 C.F.R.§§ 265.16(a)(1) – (4), and (c)];

- Maintain a written description of the type and amount of both introductory and continuing training that will be given to each person whose job position relates to hazardous waste management. See, Wis. Admin. Code § NR 665.0016(4)(c) [40 C.F.R. § 265.16(d)(3)];

At the time of the inspection, ROC was providing hazardous waste management training and contingency plan training on an annual basis to some employees. Emergency coordinators, however, were not included in this training. Also, ROC training documents did not include a written description of the type and amount of training that was to be provided to each individual whose job duties include hazardous waste management.

Summary of license exemption requirements: By violating the requirements for a license exemption, above, ROC became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. ROC failed to apply for such a license. ROC's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

UNIVERSAL WASTE VIOLATION

9. Under Wis. Admin. Code § NR 673.13(4)(a) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste lamps must close containers to prevent a release of universal waste or components to the environment.

   At the time of the inspection, ROC was storing used lamps in two fiberboard cylinders and in one gaylord box. Each container was open.

   Note: The containers were closed at the time of the inspection. No further action is requested to address this violation.

CONCLUSION

At this time, EPA is not requiring ROC to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with each of the requirements for a permit exemption outlined in the paragraphs, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken to establish compliance with all outstanding requirements listed above. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Randall Malek, WDNR (Randall.Malek@wisconsin.gov)
Michael Ellenbecker, WDNR (Michael.Ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	June 23, 2016
Facility Name:	Rust-Oleum Corporation
Facility Address:	8105 95th Street Pleasant Prairie, Wisconsin 53158
EPA RCRA ID Number:	WID988575452
Generator Status:	Large Quantity Generator
Facility Contact:	Joe Urban – EHS Manager
EPA Representative:	Brenda Whitney - Environmental Engineer RCRA Branch Compliance Section 2 Land and Chemicals Division

Prepared By:

Brenda Whitney – Environmental Engineer — 8-1-2016 Date

Approved By:

Julie Morris – Chief, Compliance Section 2 — 8/2/2016 Date

Purpose of the Inspection

An unannounced Compliance Evaluation Inspection (CEI) at Rust-Oleum Corporation ("Rust-Oleum" or "Facility") located at 8105 95th Street in Pleasant Prairie, Wisconsin, took place on June 23, 2016. Rust-Oleum has notified as a large quantity generator (LQG). The CEI was an evaluation of Rust-Oleum's compliance with LQG hazardous waste regulations codified at the authorized Wisconsin Administrative Code and the Code of Federal Regulations. Randall Malek of the Wisconsin Department of Natural Resources was unable to participate in this CEI.

Participants

The following people were present for part or all of this inspection:

Joe Urban – EHS Manager	Rust-Oleum
Jeff Lambert – Engineering Manager	Rust-Oleum
Brenda Whitney – Environmental Engineer	EPA

Introduction

I arrived at the site at 8:00 am. The receptionist at the front desk contacted Mr. Urban who met me in the lobby. I displayed my credentials, and we moved to his office where we could discuss the inspection. Mr. Urban provided me with the new employee safety training and informed me that only cotton clothing was allowed in the plant. I was to wear a lab coat as well. I provided three informational handouts to Mr. Urban: *SHWEC Environmental Programs (WDNR brochure); P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources.* I also informed Mr. Urban that I would be taking photographs during the CEI as needed. We were joined shortly by Jeff Lambert. We discussed Rust-Oleum's history, manufacturing processes, waste generation sources, and waste management procedures before departing on the tour.

Site Description

The following information about Rust-Oleum is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text.

Facility Background Information:

- This Facility was built in 1989.
- Rust-Oleum is owned by RPM, which controls approximately 10 additional facilities.
- This facility consists of one main manufacturing building and a fire pump house.
- Bulk acetone tanks and waste tanks are located outside.
- All other bulk materials and drummed/packaged raw materials are stored indoors.
- Total floor area under roof = 254,000 ft^2.
- Approximately 350 people are employed at this Facility.
- Four employee crews work 24 hours a day, 7 days a week in 2 rotating shifts..

Process Information:

- Rust-Oleum manufactures aerosol and brush paints and coatings. Rust-Oleum also fills containers with these products at this facility.
    - Raw materials are milled and combined with solvents in blending tanks. Each product is made according to a blend batch sheet.
    - The blended product is transferred via hoses to one of six fill lines. There are 4 aerosol fill lines and 2 brush products fill lines.
    - The chemical requirements for the aerosol and brush products are different.

    - For the aerosol lines, the propellant, propane, is added at the fill line.
    - After all quality checks are made and the product meets specifications, the containers are packaged and wrapped for transport.
- Raw materials used are as follows:
    - Dry goods include pigments and other additives. These materials come in drums.
    - Small amounts of liquids are also received in drums.
    - Bulk liquids such as acetone, xylene, and toluene are off-loaded into bulk tanks.
    - "Components" include everything but paint, such as cans, tips, marbles, and boxes.

Waste Generation and Management:

- Off-specification containers of product may be discarded and sent off-site as hazardous waste.
- Potassium hydroxide (KOH) is used to clean blending tanks. Waste KOH is stored in an outdoor tank (SCT-1). At the time of the inspection, this waste is sold to Beaver Oil Company for direct use as a pH adjustment chemical.
- Blending tanks and product fill lines are flushed with solvent that has been reclaimed on-site in a distillation unit otherwise known as the "solvent recovery system." Reclaimed solvent is therefore called "SRS."
- Rust-Oleum also uses 55-gallon drums of SRS as blender paddle parts-washing stations near the smaller blending units.
- Used SRS is routed for distillation. Distillation removes impurities in the solvent which reduces its volume. The lost volume is regained from the waste product that combines with the reclaim during the cleaning process. Reclaimed solvent has now replaced all virgin material that would otherwise have been needed for the cleaning process.
- During the inspection, Rust-Oleum considered the cleaning and distillation process to be closed loop or a totally enclosed treatment facility. As noted above, however, not all of the wastes routed to the distillation unit are hard-piped through the system. Some wastes are managed in 55-gallon drums, such as the parts washers identified above, which are pumped manually into the reclamation system. Also, the waste is generated from a cleaning process, not a production process.
- Still bottoms are cleaned out of the distillation unit when the efficiency/production rate drops. These wastes are pumped into an outdoor storage tank (PWT-1) prior to removal from the site.
- Solids removed from the cone bottom of T153 are managed in 55-gallon drums.
- Used rags may be either managed as hazardous waste or laundered depending on where they are generated in the facility.
- Used absorbent materials are managed as hazardous waste.
- There are no floor drains inside the facility. Process waste water is not generated at this facility. Non-contact cooling water is generated and discarded to a POTW. Truck docks are located over a sump that can discharge to a pond. The sumps are manually closed while the trucks are off-loading. Rainwater that collects in the sumps are discharged to the pond.
- All mixing vessels, grinding vessels and holding tanks for finished paint products and hazardous wastes are vented to a regenerative thermal oxidizer (RTO).

Site Tour

Production Lines 1 and 2 are immediately outside the office area. I did not observe the front end of these lines closely at this time. I finished the inspection at the back end of these lines where the waste was generated and accumulating in drums. In front of these production lines and near to the office door was a small gathering of off-spec material that Rust-Oleum offers to its employees free of charge. These materials were not managed as wastes.

In the southeast corner of the facility was a maintenance parts storage area and also the components storage area. Waste was not observed in these areas.

Further along the south wall of the facility was the customer returns and salvage areas. The customer returns collected in this area may be reused, resold, or discarded (See Appendix A: Photographs 1 and 2). According to Mr. Urban, personnel in this area only make the determination as to whether or not the materials returned are "saleable as is." Materials that are not saleable are compiled on a pallet for other personnel to determine if the materials can be used, given to employees, distilled, or need to be sent off-site for disposal. I was not able to determine who makes that secondary determination at the site.

Items in the salvage area are generally to be used in the manufacturing process. In this area, among several pallets of materials marked as "Salvage," I observed two pallets of off-spec aerosols that were also marked as "Crushable" and marked with a date of 6/23/16 (See Appendix A: Photographs 7 and 8). None of these containers were marked as "Hazardous Waste." An employee working in the area stated that the containers marked as "Crushable" were set to go off-site with the aerosol can pick-up. However, according to a facility plant manager, Chris, a determination as to whether or not aerosols are to be disposed of is made only when the hazardous waste transporter arrives at the facility. Rust-Oleum can crush a finite number of aerosol cans of paints at the facility within a certain period of time, which is roughly 70,000 cans per month. The paint collected from crushing is used as feedstock for low-specification paint. If they exceed the can limit, the overage will be given to the transporter. According to Mr. Urban, the containers I observed had not yet been determined to be waste because the transporter was not scheduled to arrive that day.

In the southernmost corner of the facility is the 90-day hazardous waste storage area (HWSA) and universal waste storage area. Two cylinders of "Universal Waste Lamps" were open and one gaylord box of "Universal Waste Used Bulbs" was open (See Appendix A: Photograph 3). One container of "Electronic Waste" was closed. The last pick-up for the universal waste was marked as being on 12-16-15. Containers of hazardous waste are placed on pallets in a rack that backs to a wall (See Appendix A: Photographs 4-6). Six 55-gallon drums of hazardous waste were in the area. The earliest date on the drums was from 6-3-16. Each container was labeled as "Hazardous Waste" and was closed. The DOT labels are added to the containers as they are prepared for shipping. The labels on the containers were facing outward and were visible for inspection. A container of rags for laundering was in this area. The container was not labeled.

The first filling line that I observed in detail was the Line 4 aerosol can filling line. From the beginning of the line, the cans are depalletized and lined up single-file. The other components are added to the can at specific stations on the line. A glass marble is dropped into the can and the paint is pumped in. The can is sealed and the propellant is pumped in through the nozzle tube assembly which has a check valve to ensure gas does not escape once pressurized. The nozzle itself is then attached to the tube completing the assembly. The finished can is placed in a hot water bath to check for leaks. The can is labeled and then the cap is placed on the can for the finished product.

In the can-filling operation, the paint lines are flushed out to be cleaned in between batches. The waste solvent is deposited into a pump system that transports the waste from the fill booth to the outdoor hazardous waste storage tank, SCT-2. The equipment associated with this tank is subject to Subpart BB requirements (See Appendix A: Photographs 9-13). Two identification tags on two valves were missing on this Line 4 unit. An open-ended line was not capped. I observed two 5-gallon buckets used to catch waste paint drips. The buckets were closed and labeled with HMIS labels identifying their hazards.

I next observed Line 3 which is the filling line for small cans. This line only runs on one shift. In regards to the pump system collecting and transporting spent solvent, I observed four valves that did not have tags. The pump had a ring tag, but it was not legible, and I could not determine if it was a BB identifier on the tag. One pipe coupler was open (See Appendix A: Photographs 14-17).

The inspection continued outside. I observed two acetone tanks outside for raw material. Next, I observed the storage area for three hazardous waste tanks PWT-1, SCT-1, and SCT-2 (See Appendix A: Photograph 18). Each tank appeared to be in good condition and was marked as "Hazardous Waste." Used SRS that is destined for the solvent recovery system is managed in SCT-2. This tank was recently outfit with a new pump and some piping (See Appendix A: Photographs 20 and 21). The pump did have a silver ring identification tag on it. Two valves associated with the pump line had not yet been marked. The middle tank, SCT-1, contained spent KOH generated from mixer cleanouts. In addition to being marked as "Hazardous Waste" and labeled with a "corrosive" placard, this tank was also labeled with a "flammable" placard. Plant representatives stated that the flammable placard was an error. The tank was marked with a start date of accumulation from 6-11-16. The third tank, PWT-1, held still bottoms pulled from the distillation unit. SCT-2 was labeled with a "flammable" placard. I did not observe start dates of accumulation on either this tank or PWT-1.

The walls of the secondary containment for the hazardous waste tanks appeared to be in good condition. Mr. Lambert stated that he did not believe the concrete had been coated. Due to rainfall the previous evening a measurable amount of water was in the containment at the time of the inspection (See Appendix A: Photograph 19). Mr. Urban stated that the water would be pumped out before the end of the shift. The overhead piping to and from the tanks was mostly over bare asphalt. I did not determine at that time if the piping was welded or pressurized with automatic shut-off devices (See Appendix A: Photographs 22 and 23).

We reentered the building through the bulk storage tank rooms. Tank 102 for storage of distilled solvent is in this room. I did not observe hazardous waste in this area. The inspection proceeded toward the distillation unit. Near this area, I observed a 55-gallon drum of used solvent labeled as "Solvent Recovery System" that was to be pumped manually into T153. The drum was dated from 6-22-16 (See Appendix A: Photograph 24). A second drum in the area external to the distillation room held rags. This container was labeled as "Hazardous Waste," and dated from 6-20-16.

A 55-gallon drum for rags, filter bags, and other non-pumpable wastes generated from equipment associated with T153 was located in the distillation room. This drum was labeled as "Hazardous Waste" and marked with a start date of accumulation from 6-9-16.

T153 stores solvent prior to it being pumped over to the distillation unit. This tank was not labeled as "Hazardous Waste." The equipment that I observed associated with T153 and the distillation unit did not appear to be tagged, and the walls were darkly stained by the pipes (See Appendix A: Photographs 25 - 27). The pump beneath T153 had a metal identification band. Reclaimed solvent from the distillation column is piped to storage tank T102 in the indoor bulk storage area. The still bottoms are pumped to PWT-1 outside.

The caustic room was next to the distillation room. A tank of potassium hydroxide is heated in this room. It is used for cleanouts in the plant and recirculated through this tank until it is no longer efficacious. Used caustic is stored in the outdoor tank, SCT-1.

The inspection proceeded to the "mixing area." Rust-Oleum has 65 mixing tanks ranging in sizes from 250 gallons to 5,000 gallons. Acetone is the main carrier for aerosol paints. Mineral spirits are also used in large quantities with other organic materials. A mill in the area uses ceramic media to grind up pigment. I made the following observations on the first floor of the mixing area:

- One 55-gallon drum was labeled as "Hazardous Waste," was marked with a start date of accumulation of 4-21-16, and had an open bung hole (See Appendix A: Photograph 28).
- A second drum next to the first was labeled as "Hazardous Waste," was not marked with a start date of accumulation, and was closed. The start date of 6-23-16 was placed on the drum during the inspection (See Appendix A: Photograph 28).
- Throughout the facility, I observed 5-gallon buckets that were used to catch drippings of paint that were going to be routed to the solvent recovery system. These buckets were not labeled. Mr. Urban stated that these were considered commercial chemical products. He indicated that these materials would be directly used as feedstock in a low-grade product.
- One 250-gallon container was marked as "Hazardous Waste." The container was not marked with a start date of accumulation or closed. According to Mr. Urban, this container was in use as a parts washer (See Appendix A: Photograph 29).
- One 55-gallon drum under blender 1004 was labeled as "Solvent Recovery System" and was to be sent to the still. Other containers in the area were also labeled as "Solvent Recovery System," though I did not denote the total number of these containers.

I made the following observations on the second floor of the mixing area:

- One 55-gallon drum was labeled as "Hazardous Waste" and was closed. This container

was not dated (See Appendix A: Photograph 30). Mr. Urban stated that this container is a 90-day container and had a start date of 6-23-16 placed on the label.

- I observed two low-pressure boilers that are used to provide steam for the steam jackets around tanks and for the water bath.
- Next to the boiler room were three 55-gallon drums that were being used as parts washers for blender posts. These containers were not labeled.

The gallon-filling line was next on the inspection. I observed one 55-gallon drum of waste filter bags in this area. The container was closed, labeled as "Hazardous Waste," and marked with a start date of accumulation from 6-21-16 (See Appendix A: Photograph 31). I did not observe a pump and piping system for line flush for this line.

The back end of Line 2 was next on the inspection. The front end of this Line was the first one that I observed as I walked into the Facility at the beginning of the walk-through. The line flush system for Line 2 uses two pumps and associated piping. I did not observe tags on this equipment. (See Appendix A: Photograph 33). A hybrid water and solvent-based product can be made on this line. A drum of this waste in the area. The waste was not to be sent to the still. Mr. Lambert explained that liquid propane is still used as a propellant in the can and it will be a hazardous waste at the point of generation. This container was closed, labeled as "Aerosol Water-Based," and as "Non-Stillable-W.B." The drum was not marked with a start date of accumulation (See Appendix A: Photograph 32). It was not determined during the inspection how this material was to be managed after it was removed from the satellite area. A second 55-gallon drum in the area held "Crushable" wastes that were to be directed to the still. The container was closed and labeled as "Recyclable Aerosols" and was dated from 6-22-16.

I next observed the back end of Line 1, for which, like Line 2, I observed the front end upon entering the Facility at the beginning of the walk-through. Near Line 1 were two 55-gallon drums. The first drum was closed and labeled as "Salvage Material" and "Non-Stillable Solvent" (See Appendix A: Photograph 34). It was not determined during the inspection how this material was to be managed once removed from the satellite area. The second drum was closed and labeled as "Recyclable aerosols" and "crushable." I did not denote observing the Line 1 pump system for line flush.

Note: I did not observe the laboratories, their associated paint spray booth, the second brush products line, or the aerosol can crusher.

End of Tour.

Records and Emergency Preparedness Review

Preparedness and Prevention: Aisle space appeared adequate in the facility and in the 90-day HWSAs. Emergency equipment was available in and or near 90-day HWSAs and is inspected on a set schedule. Arrangements with emergency responders have been made.

Contingency Plan: The contingency plan was available for review. Emergency coordinators were up to date, but were not listed according to primary and alternate designations. The

facility map in the plan includes evacuation information, signals, and routes. Emergency equipment is on the map and shows locations. A listing with descriptions was also included. Emergency responder contact information was listed including state and federal agencies and emergency spill response contractors (SET Environmental). Arrangements with those responders were described in the plan.

Training: The most recent RCRA training was offered on 3-10-15. The next training session for RCRA was scheduled for 6-27-16. Emergency coordinators are not included in the RCRA-specific training.

Job descriptions include skills, duties, and responsibilities. An outline of training requirements or expectations was not included in the description.

Manifests: Manifest records for at least three years were available for review. The final-signed copy of the manifests were not available for review at that time because the person in charge of the records at the site had left for the day. Corresponding land disposal restriction forms were available for review. From the LDR forms that I reviewed, it appeared that underlying hazardous constituents were not identified (See Appendix A: Photograph 35). The paints may carry constituents that should be identified including barium and chromium. All solvent wastes were identified as high TOC wastes with D001, F005, F003, and D035 waste numbers. Waste aerosols had only the D001 waste number.

Inspections: Weekly inspections appeared to be conducted consistently and records were available for review for at least three years.

Tank Requirements: Hazardous waste tanks PWT-1, SCT-1, and T153 are equipped with pressure transducers for level indicators, high/high float shut down equipment, and automatic waste feed cut-off systems.

The secondary containment liner systems for all three tanks appeared to be in good condition, and, and according to Facility personnel, had chemical resistant stops in the joints; however, the concrete was not lined. The water in the outdoor containment was pumped out before the end of the inspection. The ancillary equipment for the outdoor tanks was partially over asphalt and did not appear to have additional secondary containment. It was not determined during the inspection if the piping was welded or if it is inspected regularly.

The secondary containment for T-153 was not evaluated during the inspection. Information was not provided regarding the adequacy or design of this containment.

Tank assessment information for each of the four tanks was not available for review. The Facility was built in 1989 indicating that the tanks are "existing tank systems" according to Wisconsin rules which says new tanks are installed after March 1, 1991. Rust-Oleum conducts periodic ultrasonic testing for PWT-1 and T153, but not for SCT-1 (waste KOH). Rust-Oleum conducts daily inspections for PWT-1, SCT-1, and SCT-2. I did not see inspection records for T153.

Air Emissions Requirements: Rust-Oleum is a synthetic minor source of emissions generating under 25 tons of emissions annually. Rust-Oleum operates under a WDNR-issued ROP-A air permit. This license is generic and does not appear to supplant RCRA air emissions requirements.

In regards to Subchapter BB requirements, Rust-Oleum conducts Method 21 LDAR inspections in their Facility once a year. The last certification report was dated from 7-13-15. No leaks were detected. On 6-18-14, one leak was detected and repaired the same day. Records of the inspections and repair information were available for review.

In regards to Subchapter CC requirements, I did not ask for maximum organic vapor pressure calculations for their wastes. The outdoor waste tanks are vented to the RTO and are operated as Level 2 tanks. Tank 153 is managed as a Level 1 tank vented to atmosphere and is not connected to the RTO. Rust-Oleum also conducts annual inspections of their hazardous waste tanks. These inspection records were also available for review. The RTO was operating at 1643°F during the inspection, which was above their minimum required temperature.

Closing Conference

During the closing conference with the Rust-Oleum representatives, I discussed my observations noted during the inspection and asked some outstanding questions from the inspection checklists. I informed them that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from Rust-Oleum according to the letter would be expected within 30 days.

The following items were discussed with Rust-Oleum personnel at the close of the inspection.

- Information discussed and collected throughout the inspection was not claimed as confidential business information;
- Point of generation determination;
- Satellite accumulation requirements;
- Tank system and air emissions requirements;
- Universal waste requirements;
- Training record requirements;
- Contingency plan requirements;
- Closed loop exemption;
- Underlying hazardous constituent requirements.

Appendices

Appendix A: Photograph Log
Appendix B: Checklists
Appendix C: Documents received during the CEI

Photograph 1

Taken at 10:28 a.m. CST

A pallet of customer returns awaited a determination as to whether or not the material could be used, sold, or discarded.

Photograph 2

Taken at 10:30 a.m. CST

See description under Photograph 1.

Photograph 3

Taken at 10:38 a.m. CST

In the universal waste storage area were two open cylinders of "Universal Waste Lamps" and one open gaylord box of "Universal Waste Used Bulbs."

Photograph 4

Taken at 10:43 a.m. CST

Six drums of hazardous waste were stored in a 90-day hazardous waste storage area (HWSA). Each of the containers was closed and labeled as "Hazardous Waste." Only the front two containers in this photograph contained hazardous waste.

Photograph 5

Taken at 10:44 a.m. CST

See description under Photograph 4.

Photograph 6

Taken at 10:46 a.m. CST

See description under Photograph 4.

Photograph 7

Taken at 11:00 a.m. CST

Among several pallets of materials marked as "Salvage," I observed two pallets of off-spec aerosols that were also marked as "Crushable" and were dated 6/23/16.

Photograph 8

Taken at 11:01 a.m. CST

See description under Photograph 7.

Photograph 9

Taken at 11:10 a.m. CST

This pipe and valve are subject to Subpart BB. The valve has an identification tag. The bucket at the end of the pipe is used to collect waste paint that will be distilled.

Photograph 10

Taken at 11:18 a.m. CST

This pump is associated with Fill Line 4. The pump did not appear to have an identification tag.

Photograph 11

Taken at 11:18 a.m. CST

This valve and open-ended pipe are associated with Production Line 4. The valve had an identification tag. The pipe was not capped.

Photograph 12

Taken at 11:24 a.m. CST

Similar to the bucket identified in Photograph 9, this 5-gallon bucket was being used to collect waste paint that was to be distilled.

Photograph 13

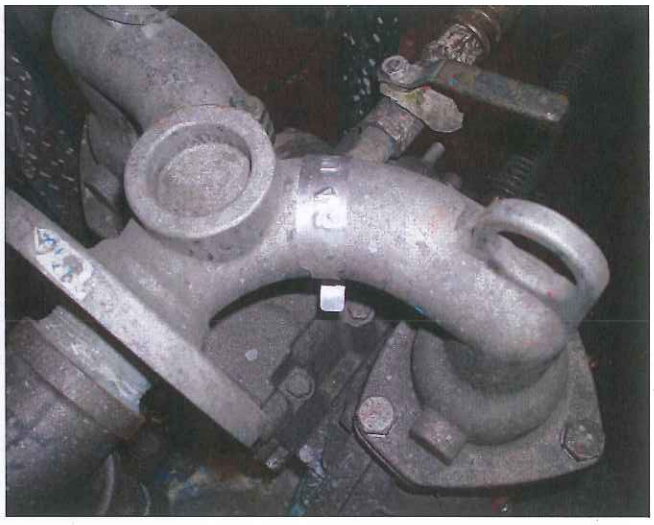
Taken at 11:47 a.m. CST

A valve on the manifold pipe leading to the SRS tank was did not appear to have a BB identification tag.

Photograph 14

Taken at 11:47 a.m. CST

This pump is associated with Line 3 and was subject to Subpart BB. It was not determined during the inspection if the metal band was a BB identification tag.



Photograph 15

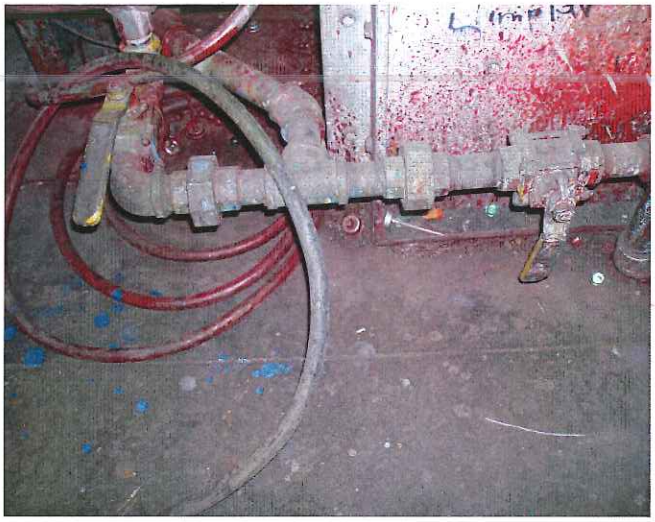
Taken at 11:47 a.m. CST

This connector is associated with Line 3. I did not observe an Subpart BB identification tag.

Photograph 16

Taken at 11:48 a.m. CST

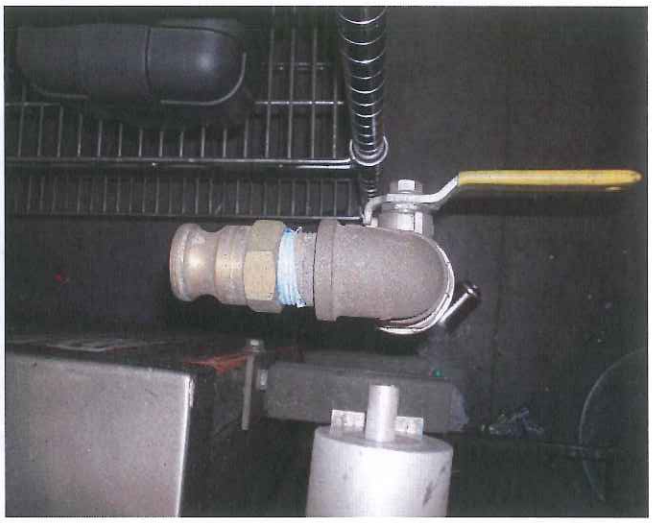
These valves and connections are associated with Line 3. I did not observe BB identification tags on this equipment.



Photograph 17

Taken at 11:48 a.m. CST

This valve and open connection are associated with Subpart BB. I did not observe BB identification tags on this equipment.



Photograph 18

Taken at 11:59 a.m. CST

These outdoor storage tanks (PWT-1, SCT-1, and SCT-2) hold hazardous waste. The middle tank (SCT-1) is used for storing spent potassium hydroxide. This tank was labeled with the corrosive placard and flammable placard.

Photograph 19

Taken at 12:00 p.m. CST

The secondary containment for the hazardous waste tanks contained a measurable amount of rainwater that was to be pumped out that day

Photograph 20

Taken at 12:02 p.m. CST

A new pump had been recently installed for PWT-1. The pump was tagged with a metal band.

Photograph 21

Taken at 12:02 p.m. CST

The valves on the piping leading to the PWT-1 tank did not appear to have Subpart BB identification tags.

Photograph 22

Taken at 12:06 p.m. CST

Overhead piping for the hazardous waste tanks did not appear to have secondary containment.

Photograph 23

Taken at 12:06 p.m. CST

The overhead piping for the outdoor hazardous waste tanks were positioned over asphalt.

Photograph 24

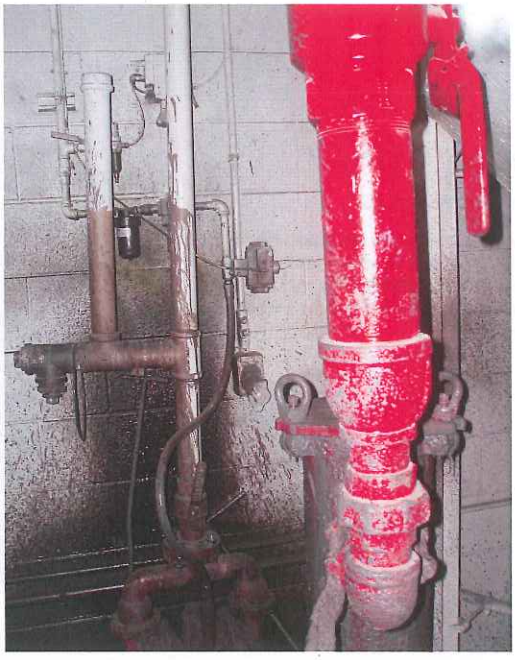
Taken at 12:14 p.m. CST

A 55-gallon drum near the distillation area was to be pumped into the distillation system. This container was brought from a satellite area and was dated one day prior to the inspection, 6-22-16. The drum was labeled as "Solvent Recovery System."

Photograph 25

Taken at 12:29 p.m. CST

Piping and equipment associated with T153 in the distillation room did not appear to be tagged with Subpart BB identification tags. The wall behind the pipes is darkly stained. The source of the staining was not determined during the inspection.



Photograph 26

Taken at 12:30 p.m. CST

Photograph 27

Taken at 12:30 p.m. CST

This piping and pump are associated with the distillation unit. The equipment did not appear to be tagged for Subpart BB. The walls and floor around this area were darky stained.

Photograph 28

Taken at 12:47 p.m. CST

Two drums were observed on the first floor of the mixing area. The leftmost drum had an open bung hold, was marked as "Hazardous Waste" and dated from 4/21/16. The rightmost drum was closed, marked as "Hazardous Waste" and was not dated.

Photograph 29

Taken at 12:53 p.m. CST

One 250-gallon container was marked as "Hazardous Waste." The container was not marked with a start date of accumulation or closed. According to Mr. Urban, this container was in use as a parts washer

Photograph 30

Taken at 1:13 p.m. CST

One 55-gallon drum on the second floor of the mixing area was designated as a 90-day container. The drum was marked as "Hazardous Waste" and was closed. The container was not marked with a start date of accumulation.

Photograph 31

Taken at 1:34 p.m. CST

I observed one 55-gallon drum of waste filter bags near the gallon-filling line. The container was closed, labeled as "Hazardous Waste," and marked with a start date of accumulation from 6-21-16.

I did not denote the contents of the rightmost drum in this photograph.

Photograph 32

Taken at 1:43 p.m. CST

Two drums of waste were observed by Line 2. The left drum was a water-based waste that was not stillable. The waste is still hazardous because it contains propane. The right drum held crushable, recyclable aerosols that would be directed to the still. This container was marked with a start date from 6-22-16.

Photograph 33

Taken at 1:51 p.m. CST

This pump and equipment are associated with Line 2. The equipment did not appear to have Subpart BB identification tags.

Photograph 34

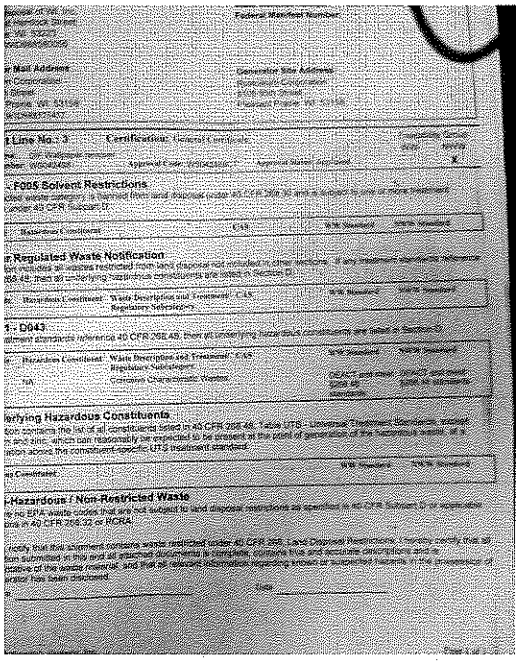
Taken at 1:56 p.m. CST

Near Line 1, was a drum labeled as "Salvage Material" and "Non-Stillable Solvent."

Photograph 35

Taken at 3:41 p.m. CST

This photograph shows an example of an LDR form for a waste generated at the Facility.



LARGE QUANTITY GENERATOR INSPECTION

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WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	ND	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	ND	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	ND	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	NA	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y NI	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport.	NI	662.031

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Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport. According to Facility	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	Y	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	Y	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	NI	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	ND	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).		662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)
B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	NA	662.034(1)(d)

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Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	Y	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	NA	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	N	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d)

5/11/16

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not ApplicableND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown
Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	N	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1

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Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	Y	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).	N	662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).	N	662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).	NA	662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.	NA	662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.	Y	662.034(1)(a)

Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).	NA	662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.	NO	

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	N	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	662.034(1)(a)1

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Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	NA	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NA	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NA	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NA	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	NA	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	NA	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2

Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.	N/A	662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N/A	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2

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Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)	N/A	662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	ND	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1)

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	NI (None Observed)	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2)
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.		679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.		679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	NA	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2)

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Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	Y	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	NA	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	Y	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	NA	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not ApplicableND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown
Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".	NA	662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	Y	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	N	
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NA	662.034(1)(a)2

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LARGE QUANTITY GENERATOR INSPECTION - TANK SYSTEM

This Inspection Form Supplement, used in conjunction with the LARGE QUANITY GENERATOR INSPECTION REPORT or TREATMENT AND STORAGE FACILITY INSPECTION REPORT, is for the inspection of facilities that are accumulating hazardous waste in non licensed tank(s) at the facility.

Tanks PWT-1, SC-1, SC-2, T153

Section 1: Assessment of an Existing Tank System's Integrity

A. If the tank was installed before March 1, 1991 and does not meet the secondary containment requirments in Section 3, there is a written assessment, certified by a PE, on file at the facility that determines the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes to be stored or treated so that it will not collapse, rupture or fail (NR 665.0191(1)). Date of the assessment: If the tank was installed after March 1, 1991, go to Section 2.	ND	662.034(1)(a)2
B. Assessment considers ALL of the following (NR 665.0191(2)): 1. Design standards for construction of the tank and ancillary equipment. 2. Hazardous characteristics for the wastes handled. 3. Corrosion protection measures. 4. The age of the tank system, either documented or estimated. 5. Results of a leak test, internal inspection or other tank integrity examination.	NA	662.034(1)(a)2

Section 2: Design and Installation of a New Tank System

A. If the tank was installed after March 1, 1991, a written assessment has been reviewed and certified by an independent, registered PE that determines the system has suffcient structural integrity and is acceptable for storing or treating hazardous waste (NR 665.0192(1)). Date of Assessment	NA	662.034(1)(a)2
B. The written assessment includes ALL of the following (NR 665.0192(1)): 1. Design standards for construction of the tank and ancillary equipment. 2. Hazardous characteristics for the wastes handled. 3. For underground tank system components likely to be affected by vehicular traffic, a determination of design or operational measures to protect the tank system against potential damage.		662.034(1)(a)2
C. Where the external shell of a new metal tank or component is in contact with soil or water, the written assessment includes ALL of the following factors affecting the potential for corrosion (NR 665.0192(1)(c)1): 1. Soil moisture content, soil pH, soil sulfides level and soil resistivity. 2. Structure to soil potential. 3. Influence of nearby underground metal structures (piping). 4. Stray electric current. 5. Existing corrosion-protection measures (coating, cathodic protection).		662.034(1)(a)2
D. Where the external shell of a new metal tank or component is in contact with soil or water, the written assessment includes the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system, consisting of one or more of the following (NR 665.0192(1)(c)2): 1. Corrosion-resistant materials of construction such as special alloys or fiberglass-reinforced plastic. 2. Corrosion-resistant coating with cathodic protection (impressed current or sacrificial anodes). 3. Electrical isolation devices (insulating joints and flanges).		662.034(1)(a)2
E. The written assessment includes design considerations to ensure ALL of the following (NR 665.0192(1)(e): 1. Tank foundations will maintain the load of the full tank. 2. Tank system is anchored to prevent floating or being dislodged if placed in a saturated zone. 3. Tank system will with stand effects of frost heave.		662.034(1)(a)2
F. An independent, qualified installation inspector or professional engineer inspected the system for structural damage or inadequate construction or installation such as weld breaks, punctures, scrapes of protective coatings and cracks before covering, enclosing or putting the new tank system in use (NR 665.0192(2)).		662.034(1)(a)2
G. Underground components are completely backfilled with noncorrosive, porous and homogenous material that is compacted so the tank and piping are fully and uniformly supported (NR 665.0192(3)).		662.034(1)(a)2

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Section 2: Design and Installation of a New Tank System

H. Tank system was tested for tightness before it was covered, enclosed or put in use (NR 665.0192(4)). Indicate if repairs were made as a result of the tightness test. Note: If a tank system meeting secondary containment requirements is already in use, a tightness test is not required, per NR 664.0193(9).		662.034(1)(a)2
I. Ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction (NR 665.0192(5)).		662.034(1)(a)2
J. Corrosion protection is provided to ensure the integrity of the tank system (NR 665.0192(6)).		662.034(1)(a)2
K. Written statements regarding the certification of the design of the tank and the supervision of its installation are kept at the facility (NR 665.0192(7)).		662.034(1)(a)2

Section 3: Containment and Detection of Releases

A. The tank system stores or treats waste that does not contain free liquids and is situated inside a building with an impermeable floor. If YES, go to Section 4.	NO	
B. Secondary containment system meets ALL of the following (NR 665.0193(3)): 1. Constructed of or lined with materials that are compatible with the wastes placed in the tank. 2. Has sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions and stresses of daily operation. 3. Placed on a foundation or base that provides support to the secondary containment system and is capable of preventing failure due to settlement, compression or uplift. 4. Leak-detection system is designed and operated so it detects the failure of either the primary or secondary containment structure or the presence of a release within 24 hours or the earliest practicable time if a release cannot be detected within 24 hours. 5. Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation.	ND	662.034(1)(a)2
C. Spilled waste and accumulated precipitation are removed from the secondary containment system within 24 hours or in a timely manner if removal within 24 hours cannot be accomplished (NR 665.0193(3)(d)).	Y	662.034(1)(a)2
D. External liner system meets ALL of the following (NR 665.0193(5)(a)): 1. Designed or operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Free of cracks and gaps. 4. Designed and installed to surround the tank completely and cover all surrounding earth likely to come in contact with the waste.	Y	662.034(1)(a)2
E. Vault system meets ALL of the following (NR 665.0193(5)(b)): 1. Designed and operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Constructed with chemical resistant water stops in place at all joints. 4. Provided with an impermeable interior coating or lining that is compatible with the stored waste and will prevent migration of waste into the concrete. 5. Provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is stored or treated. 6. Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure.	NA	662.034(1)(a)2

visual

According to Facility

Section 3: Containment and Detection of Releases

F. Double-walled tank meets ALL of the following (NR 665.0193(5)(c)): 1. Designed as an integral structure so that the outer shell contains any release from the inner tank. 2. If constructed of metal, protected from corrosion of the primary tank interior and of the external surface of the outer shell. 3. Provided with a built-in continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time.	NA	662.034(1)(a)2
G. The Department approved an equivalent type of secondary containment device when the device is not an external liner, vault system or double-walled tank (NR 665.0193(4)(d))		662.034(1)(a)2
H. All ancillary equipment has secondary containment (trench, jacketing, double walled piping) except for the following if they are visually inspected for leaks on a daily basis (NR 665.0193(6)): 1. Aboveground piping, excluding flanges, joints, valves and other connections. 2. Welded flanges, welded joints and welded connections. 3. Sealless or magnetic coupling pumps and sealless valves. 4. Pressurized aboveground piping systems with automatic shut-off devices (excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices).	ND	662.034(1)(a)2
I. If the tank system does not meet the above secondary containment system requirements, the owner or operator complies with the following (NR 665.0193(9)): 1. For non-enterable underground tanks, conduct a leak test at least annually. 2. For other than non-enterable underground tanks, conduct a leak test or have a PE develop a schedule and procedure for assessing the overall condition of the tank system at a frequency to be determined by the operating conditions of the tank system. 3. For ancillary equipment, a leak test or other integrity assessment conducted at least annually. 4. The results of the assessments are maintained in the facility files.	ND	662.034(1)(a)2

Section 4: General Operating Requirements

A. Hazardous waste or treatment reagents placed into the tank system will not cause the tank, ancillary equipment or containment system to rupture, leak, corrode, or otherwise fail (NR 665.0194(1)).	Y	662.034(1)(a)2
B. The following controls and practices are used to prevent spills and overflows from the tank or containment system (NR 665.0194(2)): 1. Spill prevention controls (check valves or dry disconnect couplings). 2. Overfill prevention controls (level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank). 3. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind actions or precipitation.	Y	662.034(1)(a)2
C. Tank is clearly labeled or marked with the words, "Hazardous Waste". T153	N	662.034(1)(c)

Section 5: Inspections

A. ALL of the following are inspected at least once each operating day (NR 665.0195(1)): 1. Aboveground portions of the tank system to detect corrosion or releases of waste. 2. Data gathered from monitoring and leak detection equipment (pressure or temperature gauges, monitoring wells) to ensure that the tank system is operated according to its design. 3. The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of hazardous waste releases (wet spots, dead vegetation). 4. Overfill or spill control equipment (waste-feed cutoff systems, bypass systems and drainage systems).	Y	662.034(1)(a)2

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Section 5: Inspections

B. The proper operation of the cathodic protection system is confirmed within 6 months of the initial installation and annually thereafter (NR 665.0195(2)(a)).	NA	662.034(1)(a)2
C. All sources of impressed current are inspected and/or tested at least every other month (NR 665.0195(2)(b).	NA	662.034(1)(a)2
D. Facility documents the inspections in the operating record (NR 665.0195(3)).	Y	662.034(1)(a)2

Section 6: Response to Leak and Spills

A. There has been a spill or leak from the tank system or containment system. If NO, go to Section 7.	NO	
B. Tank system or secondary containment system was removed from service immediately (NR 665.0196).	NA	662.034(1)(a)2
C. Flow of hazardous waste into the tank system or secondary containment system was stopped immediately and the system was inspected to determine the cause of the release (NR 665.0196(1)).		662.034(1)(a)2
D. If release was from the tank system, the owner or operator removed as much waste as necessary to prevent further releases and allow inspection and repair of the tank system within 24 hours after detection or at the earliest practicable time (NR 665.0196(2)(a)).		662.034(1)(a)2
E. If material was released to a secondary containment system, all released material was removed within 24 hours or in a timely manner to prevent harm to human health and the environment (NR 665.0196(2)(b)).		662.034(1)(a)2
F. A visual inspection of the release was conducted (NR 665.0196(3)).		662.034(1)(a)2
G. Further migration of the spill to soils or surface water was prevented (NR 665.0196(3)(a)).		662.034(1)(a)2
H. Visible contamination of the soil or surface water was removed and properly disposed of (NR 665.0196(3)(b)).		662.034(1)(a)2
I. Release was reported to the Department within 24 hours of its detection except when less than one pound was released and the material was contained and cleaned up immediately (NR 665.0196(4)).		662.034(1)(a)2
J. Written report was submitted to the Department within 30 days of detecting the release (NR 665.0196(4)(c)).		662.034(1)(a)2
K. If the integrity of the tank system was not damaged, the system was returned to service after cleanup and repairs (NR 665.0196(5)(b)).		662.034(1)(a)2
L. If the leak was from the tank system into secondary containment, the system was repaired before the tank was returned to service (NR 665.0196(5)(c)).		662.034(1)(a)2
M. If the leak was from a component that did not have secondary containment, either secondary containment was provided or repairs were made if the component can be visually inspected (NR 665.0196(5)(d)).		662.034(1)(a)2
N. Certification by a PE was obtained and submitted to the Department within 7 days of returning the tank system to use after major repairs to the tank system (NR 665.0196(6)).		662.034(1)(a)2

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Section 7: Special Requirements for Ignitable, Reactive or Incompatible Wastes

A. Ignitable, reactive or incompatible waste is stored or treated in tanks. If NO, go to Section 8.	Y	
B. The waste is treated or mixed before or immediately after placement in a tank system so that ALL of the following apply (NR 665.0198(1)(a)): 1. Extreme heat, pressure, fire, explosions or reactions are not produced. 2. Uncontrolled toxic or flammable fumes or gases are not produced. 3. The structural integrity of the tank system is not damaged. 4. Other measures are taken so that human health or the environment is not threatened. 5. The waste no longer meets the definition of ignitable or reactive waste.	Y According to Facility	662.034(1)(a)2
C. Ignitable or reactive waste is stored or treated in a way to protect it from any material or conditions that may cause the waste to ignite or react (NR 665.0198(1)(b)).	Y	662.034(1)(a)2
D. Tank system is only used to treat or store ignitable or reactive waste during an emergency (NR 665.0198(1)(c)).	N	662.034(1)(a)2
E. Buffer zone requirements between the tanks and any public ways or adjoining property lines are in compliance with the NFPA standards in the Flammable and Combustible Liquids Code (NR 665.0198(2)).	ND	662.034(1)(a)2
F. Tank system is decontaminated before adding an incompatible waste (NR 665.0199(2)).	NA	662.034(1)(a)2

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

A. Hazardous waste tanks are excluded from subch. CC requirements because BOTH of the following are met (NR 665.1083(3)(a)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the tank. 2. The initial determination of the average VO concentration is reviewed and updated at least once every 12 months.	N	662.034(1)(a)2
B. Waste determinations for excluded tanks are made according to ALL of the following (NR 665.1084(1)): 1. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the tank. 2. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 3. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	NA	662.034(1)(a)2
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)2
D. Tanks are excluded from CC requirements because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 665.1080(4)). Note: Certain records are to be maintained. Refer to NR 665.1090(9) for more information.	NA	662.034(1)(a)2

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E. Hazardous waste tanks are excluded from CC requirements because of the following (NR 665.1080(2)): 1. Waste is no longer added to the tank and closure has been implemented or completed. 2. The tank is used solely to store or treat on-site remediation wastes generated through NR 700 or RCRA corrective action activities OR radioactive mixed wastes in accordance with NRC requirements. 3. The tank is equipped with air emission controls operating in accordance with the Clean Air Act requirements AND the facility records include a certification signed by the owner or operator and the specific air program compliance requirements for the unit. 4. If an enclosure is used as the air emission control, the enclosure is in compliance with the enclosure and control device requirements unless the tank bulk feeds to an incinerator. 5. The tank has a process vent subject to Subch. AA requirements.	NA	662.034(1)(a)2
F. Hazardous waste tanks are excluded from CC regulation because of any of the following (NR 665.1083(3)): 1. The organic content of all waste entering the tank has been reduced by an organic destruction or removal process described in NR 665.1083(3). 2. The hazardous organic constituents placed in the tank are treated to meet LDR standards. 3. The tank is in an enclosure that vents to a control device and bulk feeds to an incinerator.	NA	662.034(1)(a)2
G. All tanks ar excluded from subch. CC requirements. If YES, stop.	NO	
H. The maximum organic vapor pressure of the hazardous waste managed in a fixed roof tank is less than the maximum organic vapor pressure limit for the tank's design capacity category as follows (NR 662.034(1)(a)2, NR 665.1085(2)(a)). If NO, go to Question ZB. 1. Tank design capacity is >= 40,000 gallons and the maximum organic vapor pressure limit for the tank is 0.75 psi (5.2 kPa). 2. Tank design capacity is between 20,000 to 40,000 gallons and the maximum organic vapor pressure limit for the tank is 4.0 psi (27.6 kPa). 3. Tank design capacity is <20,000 gallons and the maximum organic vapor pressure limit for the tank is 11.1 psi (76.6 kPa).	ND	
I. The maximum organic vapor pressure of the hazardous waste managed in the tank is determined according to ALL of the following (NR 665.1085(3)(a)): 1. The maximum organic vapor pressure is determined before the waste is first placed in the tank. 2. A new determination is performed when changes to the hazardous waste could cause the maximum organic vapor pressure to increase to or exceed the maximum vapor pressure for the tank design capacity. 3. The maximum organic vapor pressure was determined by either direct measurement or knowledge. Note: See NR 665.1084(3)(c) for direct measurement procedures and NR 665.1084(3)(d) for using knowledge.	ND	662.034(1)(a)2
J. If the maximum organic vapor pressure was determined by direct measurement, the date and time of sample collection, and the analytical method and results are maintained in the facility records (NR 665.1090(2)(b)).	ND	662.034(1)(a)2
K. If the maximum organic vapor pressure was determined by direct measurement, a copy of the written sampling plan is on file (NR 665.1084(3)(c)).	ND	662.034(1)(a)2
L. If the maximum organic vapor pressure was determined by knowledge, the facility records include the information used as the basis for knowing that the maximum organic vapor pressure limit of the hazardous waste is less than the maximum vapor pressure limit listed for the applicable tank design capacity category (NR 665.1084(3)(d)).	ND	662.034(1)(a)2
M. The tank is equipped with a fixed roof and closure devices to form a continuous barrier over the entire surface area of the hazardous waste in the tank (NR 665.1085(3)(b)).	Y	662.034(1)(a)2
N. The fixed roof is a separate cover installed on the tank (a removable cover mounted on an open-top tank) or an integral part of the tank structural design (horizontal cylindrical tank equipped with a hatch) (NR 665.1085(3)(b)1).	YES	662.034(1)(a)2

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Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

O. The fixed roof is installed in a manner so there are no cracks, holes, gaps or other open spaces visible between the roof section joints or between the interface of the roof edge and tank wall (NR 665.1085(3)(b)2).	Y	662.034(1)(a)2
P. Each opening in the fixed roof and any manifold system for the fixed roof is equipped with EITHER of the following (NR 665.1085(3)(b)3): 1. A closure device that, when closed, has no visible cracks, holes, gaps or other open spaces. 2. A closure device connected by a closed-vent system to a control device that is operating whenever hazardous waste is managed in the tank, except during routine inspections and maintenance.	Y	662.034(1)(a)2
Q. The closure devices and fixed roof are made of materials that minimize the release of hazardous waste to the atmosphere and maintain the integrity of the roof and closure devices (NR 665.1085(3)(b)4). According to Facility	Y	662.034(1)(a)2
R. Each closure device is secured in the closed position and the fixed roof installed except when inspections and maintenance are performed or tank sludge is removed (NR 665.1085(3)(c)1).	Y	662.034(1)(a)2
S. If the tank is equipped with a pressure relief device which vents to the atmosphere, there are no detectable organic emissions (<500 ppmv) when the pressure relief device is closed (NR 665.1085(3)(c)2). According to records	Y	662.034(1)(a)2
T. The pressure relief device is only opened during normal operations to maintain the tank internal pressure according to tank design specifications (NR 665.1085(3)(c)2).	Y	662.034(1)(a)2
U. Safety devices are only opened when necessary to avoid unsafe conditions (NR 665.1085(3)(c)3).	Y	662.034(1)(a)2
V. The fixed roof and closure devices are visually inspected at least once every year for the following defects, at a minimum, that could result in air pollutant emissions (NR 665.1085(3)(d)): 1. Visible cracks, holes or gaps in the roof sections or between the roof and tank wall. 2. Damaged seals or gaskets on closure devices. 3. Broken or missing hatches, access covers, caps or other closure devices.	ND	662.034(1)(a)2
W. If inspections are conducted at intervals longer than one year, the fixed roof or closure device has been designated as "unsafe to inspect and monitor" (NR 665.1085(12)).	NA	662.034(1)(a)2
X. If the fixed roof or closure device has been designated as "unsafe to inspect and monitor", ALL of the following information is recorded in a log (665.1090(7)): 1. The identification numbers for the roof or closure device with covers that are designated as "unsafe to inspect and monitor". 2. A written explanation stating the reasons why the roof or closure device is unsafe to visually inspect or monitor. 3. A written plan and schedule for inspecting and monitoring the roof or closure device as frequently as practical when a worker can gain safe access.	NA	662.034(1)(a)2
Y. First efforts of repair are made within 5 calendar days of detection and completed no later than 45 calendar days of detection unless repair is delayed (NR 665.1085(11)).	NA	662.034(1)(a)2
Z. Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity (NR 665.1085(11)).	NA	662.034(1)(a)2
ZA. Inspection records are maintained for at least 3 years and include all of the following (NR 665.1085(3)(d)4): 1. Tank ID#. 2. Date of inspection. 3. Location and description of the defect. NONE FOUND 4. Date the problem was detected and the corrective action taken. 5. Reason repair was delayed and the date of completion, if applicable.	Y	662.034(1)(a)2

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ZB. The facility manages hazardous waste in a tank according to any of the following (NR 662.034(1)(a)2, NR 665.1085(2)(b)). If YES, complete the Subch. CC Level 2 and 3 Standards for Containers and Tanks inspection form. 1. Hazardous waste in the tank has a maximum organic vapor pressure greater or equal to the maximum limit for the tank's design capacity category as stated in Question 8.H. 2. Tank is used for a waste stabilization process. 3. Hazardous waste in the tank is heated to a temperature greater than the temperature at which the vapor pressure was determined. 4. Tank has a fixed roof with an internal floating roof. 5. Tank has an external floating roof. 6. Tank is subject to subch. CC vented to a control device. 7. Tank is a pressure tank. 8. Tank is located inside an enclosure.	ND	DO NOT have MOVP calculation
ZC. If hazardous waste is transferred from one tank to another tank subject to level 1 or level 2 standards, continuous hard-piping or another closed system that does not allow exposure of hazardous waste to the atmosphere is used, except under any of the following conditions (NR 665.1085(10)): 1. The average VO concentration at the point of waste origination is <500 ppmw and is determined at least once every 12 months. 2. Hazardous waste has been treated to a specified concentration by an organic or biological destruction or removal process. 3. The organic constituents of the hazardous waste placed in the tank are treated to meet the LDR treatment standards.	NA	664.1090(1)

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LARGE QUANTITY GENERATOR INSPECTION - SUBCH. BB REQUIRMENTS FOR EQUIPMENT LEAKS

This Inspection Form, used in conjunction with the LARGE QUANTITY GENERATOR INSPECTION REPORT, is for the inspection of facilities that are operating a closed vent system and control device to control air emissions from equipment subject to ch. NR 665 subch. BB requirements.

Section 1: Standards for Pumps in Light Liquid Service

A. Pumps in light liquid service are used at the facility. If NO, go to Section 2.	Y	
B. The facility has marked each pump subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3)).	N	662.034(1)(a)
C. All pumps are equipped with a closed-vent system capable of capturing and transporting leakage from seals to a control device. If YES, go to section 2 and complete the inspection form, "LQG Subch. BB Standards for Closed Vent Systems and Control Devices". (NR 665.1052(6)).	N	662.034(1)(a)
D. Each pump is equipped with a dual mechanical seal system and barrier fluid system that meets ANY of the following requirements: (NR 665.1052(4)) 1. The dual mechanical seal system operates with the barrier fluid at a pressure that is always greater than the pump stuffing box pressure. 2. The dual mechanical seal system is equipped with a barrier fluid degassing reservoir connected by a closed-vent system to a control device. 3. The dual mechanical seal system is equipped with a system that purges the barrier fluid into a hazardous waste stream with no detectable emissions to the atmosphere.	N	662.034(1)(a)
E. Each pump is equipped with a dual mechanical seal system and barrier fluid system that meets ALL of the following requirements: If Questions 1.D. and 1.E are YES, go to Section 2. (NR 665.1052(4)) 1. The barrier fluid system is not a hazardous waste with organic concentrations of >= 10% by weight. 2. Each barrier fluid system is equipped with a sensor to detect failure of the seal system, the barrier fluid system or both. 3. Each pump is checked by visual inspection each calendar week for liquids dripping from the pump seal. 4. Each sensor for detecting failure is checked daily or equipped with an audible alarm that is checked monthly to ensure it is functioning properly. 5. A criterion to indicate failure of the seal system, the barrier fluid system, or both has been determined based on design considerations and operating experience. 6. When a leak is detected (liquid dripping from the pump seal or a sensor indicates failure of the seal system or barrier fluid system), the first attempt at repair is made within 5 days of it being detected. 7. The leak is repaired as soon as practicable, but no later than within 15 days of detecting the leak, except when the repair is technically infeasible without equipment shutdown.	N	662.034(1)(a)
F. A pump designated in the operating log as operating with no detectable emissions (instrument reading <500 ppm above background) meets ALL of the following: (NR 665.1052(5)) 1. The pump has no externally actuated shaft penetrating the pump housing. 2. The pump is tested initially upon designation and annually thereafter to assure it operates with no detectable emissions (<500 ppm above background).	~~NA~~ Y BW	662.034(1)(a)
G. Equipment measuring nondetectable emissions meet ALL of the following: If Questions 1.F. and 1.G. are YES, go to Section 2. (NR 665.1052(5)) 1. Monitoring complies with Method 21 in appendix A, 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The background level is determined according to Method 21 in appendix A of 40 CFR part 60. 6. The instrument probe is traversed around all potential leak interfaces as closely as possible. 7. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm.	~~NA~~ Y BW According to Facility	662.034(1)(a)

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LARGE QUANTITY GENERATOR INSPECTION - SUBCH. BB REQUIRMENTS FOR EQUIPMENT LEAKS

Section 1: Standards for Pumps in Light Liquid Service

H. Each pump is monitored monthly according to ALL of the following: (NR 665.1052(1)(a), NR 665.1063(2)) 1. Monitoring complies with Method 21 in appendix A of 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The instrument probe is traversed around all potential leak interfaces as closely as possible.	NA	662.034(1)(a)
I. Each pump is visually inspected every calendar week for liquids dripping from the pump seal. (NR 665.1052(1)(b)).	NA	662.034(1)(a)
J. When a leak is detected (an instrument reading of >=10,000 ppm or liquids dripping from the pump seal), a weatherproof and readily visible identification is attached to the leaking pump which indicates the equipment ID number, the date evidence of a potential leak was found, and the date the leak was detected. (NR 665.1064(3))	NA None Found	662.034(1)(a)
K. The identification is removed after the pump is repaired. (NR 665.1064(3))	NA	662.034(1)(a)
L. If a leak is detected, the first attempt at repair (tightening the packing gland) is made within 5 calendar days of detecting the leak. (NR 665.1052(3))	NA	662.034(1)(a)
M. Repair is completed as soon as practicable, but no later than 15 calendar days after detecting the leak, except when the repair is technically infeasible without equipment shutdown. (NR 665.1052(3))	NA	662.034(1)(a)
N. If repair is technically infeasible without equipment shutdown, the pump is repaired before the end of the next hazardous waste management shutdown. (NR 665.1059(1))	NA	662.034(1)(a)
O. While repair is delayed, the pump is isolated from the hazardous waste management unit and the pump does not contain or contact hazardous waste with organic concentrations >= 10% by weight. (NR 665.1059(2))	NA	662.034(1)(a)
P. If repair of the pump is delayed, the repair requires use of a dual mechanical seal system that includes a barrier fluid system or the repair is completed as soon as practicable, but within 6 months of detecting the leak. (NR 665.1059(4))	NA	662.034(1)(a)

Section 2: Standards for Compressors

A. A compressor is used at the facility. If NO, go to Section 3.	NO	
B. The facility has marked each compressor subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3))	N/A	662.034(1)(a)
C. The compressor operates with an instrument reading <500 ppm above background and is designated in the operating log for no detectable emissions. (NR 665.1053(9))	↓	662.034(1)(a)

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Section 2: Standards for Compressors

D. The equipment measuring nondetectable emissions meets ALL of the following: (NR 665.1053(9)) 1. Monitoring complies with Method 21 in appendix A, 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The background level is determined according to Method 21 in appendix A of 40 CFR part 60. 6. The instrument probe is traversed around all potential leak interfaces as closely as possible. 7. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm.	NA	662.034(1)(a)
E. Testing of emissions is done initially upon designation, annually thereafter and at other times specified by the department. If 2. C, 2. D and 2. E. are YES, go to Section 3. NR 665.1053(9)		662.034(1)(a)
F. All compressors are equipped with a closed-vent system that captures and transports leakage from the compressor seal to a control device. If YES, go to 2. L. and complete the inspection form, "LQG Subch. BB Standards for Closed Vent Systems and Control Devices". (NR 665.1053(8))		662.034(1)(a)
G. The compressor is equipped with a seal system, including a barrier fluid system, which prevents leakage of total organic emissions to the atmosphere. (NR 665.1053(1))		662.034(1)(a)
H. The compressor seal system is ANY of the following: (NR 665.1053(2)) 1. Operated with the barrier fluid at a pressure that is always greater than the compressor stuffing box pressure. 2. Equipped with a barrier fluid system that is connected by a closed vent system to a control device. Note: Complete the inspection form, "Standards for Closed Vent Systems and Control Devices for subch. AA and BB". 3. Equipped with a system that purges the barrier fluid into a hazardous waste stream with no detectable emissions to the atmosphere.		662.034(1)(a)
I. If the barrier fluid is a hazardous waste, organic concentrations are <10%. (NR 665.1053(3))		662.034(1)(a)
J. Each barrier fluid system is equipped with a sensor that detects failure of the seal system, barrier fluid system or both. (NR 665.1053(4))		662.034(1)(a)
K. Each sensor for the barrier fluid system is checked daily and is equipped with an audible alarm that is checked monthly, unless the compressor is located within the boundary of an unmanned plant site. (NR 665.1053(5)(a))		662.034(1)(a)
L. When a leak is detected in a compressor, a weatherproof and readily visible identification is attached to the leaking compressor which contains the equipment ID number, the date evidence of a potential leak was found, and the date the leak was detected. (NR 665.1064(3))		662.034(1)(a)
M. The identification on the compressor is removed after repair. (NR 665.1064(3))		662.034(1)(a)
N. When a leak is detected, first attempt at repair (e.g., tightening the packing gland) is made within 5 calendar days of detecting the leak. (NR 665.1053(7))		662.034(1)(a)
O. Repair is completed as soon as practicable, but no later than 15 calendar days after detecting the leak, except when the repair is technically infeasible without equipment shutdown. (NR 665.1053(7))		662.034(1)(a)
P. If the repair is technically infeasible without equipment shutdown, the equipment is repaired before the end of the next hazardous waste management unit shutdown. (NR 665.1059(1))		662.034(1)(a)

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Section 2: Standards for Compressors

Q. While repair is delayed, the compressor is isolated from the hazardous waste management unit and the compressor does not contain or contact hazardous waste with organic concentrations of >= 10% by weight. (NR 665.1059(2))	NA	662.034(1)(a)

Section 3: Standards for Pressure Relief Devices in Gas or Vapor Service

A. Pressure relief devices are used at the facility. If NO, go to Section 4.	Y	
B. The facility has marked each pressure relief device subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3)) Not Observed	N	662.034(1)(a)
C. All pressure relief devices are equipped with a closed-vent system capable of capturing and transporting leakage to a control device. If YES, go to Section 4 and complete the inspection form, "LQG Subch. BB Standards for Closed Vent Systems and Control Devices". (NR 665.1054(3))	N	662.034(1)(a)
D. Each pressure relief device is operated with no detectable emissions (instrument readings <500 ppm above background) except during pressure releases. (NR 665.1054(1)) According to Facility	Y	662.034(1)(a)
E. The equipment measuring nondetectable emissions meets ALL of the following: (NR 665.1054(1), NR 665.1063(3)) 1. Monitoring complies with Method 21 in appendix A of 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The background level is determined according to Method 21 in appendix A of 40 CFR part 60. 6. The instrument probe is traversed around all potential leak interfaces as closely as possible. 7. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm. According to Facility	Y	662.034(1)(a)
F. After each pressure release, the pressure relief device is returned to a condition of no detectable emissions (instrument reading <500 ppm above background) as soon as practicable, but no later than 5 calendar days after each pressure release, except when the repair is technically infeasible without equipment shutdown. (NR 665.1054(2)(a))	Y	662.034(1)(a)
G. If the repair is technically infeasible without equipment shutdown, the pressure release device is repaired before the end of the next hazardous waste management unit shutdown. (NR 665.1059(1))	NA	662.034(1)(a)
H. If repair has been delayed, the pressure relief device is isolated from the hazardous waste management unit and does not continue to contain or contact hazardous waste with organic concentrations of >= 10% by weight. (NR 665.1059(2))	NA	662.034(1)(a)
I. Within 5 calendar days of each pressure release, the pressure relief device is monitored using Method 21 in appendix A of 40 CFR part 60 to confirm the device has been returned to a condition of no detectable emissions (instrument readings <500 ppm above background). (NR 665.1054(2)(b)) NA BW Y		662.034(1)(a)

Section 4: Standards for Sampling Connection Systems

A. The facility uses a sampling connection system. If NO, go to Section 5. Not listed on BB list	No	
B. The facility has marked each sampling connection system subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3))		662.034(1)(a)

Section 4: Standards for Sampling Connection Systems

C. An in-situ sampling system or sampling system without purging is used. If YES, go to Section 5. (NR 665.1055(3))	N/A	662.034(1)(a)
D. Each sampling connection system is equipped with a closed-purge, closed-loop, or closed-vent system that collects the sample purge and returns it to the process or routes it to a treatment system. (NR 665.1055(1))		662.034(1)(a)
E. Purged process fluid is managed by ANY of the following: (NR 665.1055(2)) 1. Returned directly to the process line. 2. Collected and recycled. 3. Captured and transported to a control device or a waste management unit in compliance with subch. CC requirements. Note: If transported to a control device, complete the inspection form, "Standards for Closed Vent Systems and Control Devices for subch. AA and BB".		662.034(1)(a)

Section 5: Standards for Open-Ended Valves or Lines

A. Open-ended valves or lines are in service at the facility. If NO, go to Section 6. Observed, but Not listed on BB list	No Y BW	
B. The facility has marked each open-ended valve or line subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3))	N	662.034(1)(a)
C. Each open-ended valve or line is equipped with a cap, blind flange, plug or second valve. (NR 665.1056(1)(a))	N	662.034(1)(a)
D. The cap, blind flange, plug or second valve seal the open-end at all times, except when operations require hazardous waste to flow through the open-ended valve or line. (NR 665.1056(1)(b))	should Y	662.034(1)(a)
E. If the open-ended valve or line is equipped with a second valve, the valve on the hazardous waste stream end is closed before the second valve is closed. (NR 665.1056(2))	N/A	662.034(1)(a)
F. If a double block and bleed system is used, the bleed valve or line only remains open when the line between the block valves is vented. (NR 665.1056(3))	N/A	662.034(1)(a)

Section 6: Standards for Valves in Gas or Vapor Service or in Light Liquid Service

A. Valves in gas or vapor service or in light liquid service are used. If NO, go to Section 7.	Y	662.034(1)(a)
B. The facility has marked each valve subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3))	N	662.034(1)(a)
C. Valves with no detectable emissions (instrument reading <500 ppm above background) comply with ALL of the following: (NR 665.1057(6)) 1. The valves have no external actuating mechanism in contact with the hazardous waste stream. 2. Testing of emissions is done initially upon designation, annually thereafter and at other times specified by the department. 3. The valves are designated in the operating log for no detectable emissions.	Y	662.034(1)(a)

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Section 6: Standards for Valves in Gas or Vapor Service or in Light Liquid Service

D. The equipment measuring nondetectable emissions meets ALL of the following: If Questions 6. C. and 6.D. are YES for all valves subject to subch. BB, go to Question 6. P. (NR 665.1057(6)) 1. Monitoring complies with Method 21 in appendix A, 40 CFR part 60. 2. The detection instrument meets performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The background level is determined according to Method 21 in appendix A of 40 CFR part 60. 6. An instrument probe is traversed around all potential leak interfaces as closely as possible. 7. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm.	Y	662.034(1)(a)
E. For each valve designated as unsafe-to-monitor, a determination was made that monitoring personnel would be exposed to an immediate danger as a consequence of monitoring by Method 21. (NR 665.1057(7))	NA	662.034(1)(a)
F. The facility follows a written plan that requires monitoring of each unsafe valve as frequently as practicable during safe-to-monitor times. If Questions 6. E. and 6.F. are YES for all other valves subject to subch. BB, go to Question 6. P. (NR 665.1057(7))	NA	662.034(1)(a)
G. Each valve designated as difficult-to-monitor meets ANY of the following: If YES, go to Question 6. P. (NR 665.1057(8)) 1. The valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface. 2. The valve is part of a hazardous waste management unit in operation before June 1, 1995. 3. A written plan is followed that requires monitoring of the valve at least once per calendar year.	NA	662.034(1)(a)
H. Each valve is monitored monthly to detect leaks according to ALL of the following: (NR 665.1057(1), NR 665.1063(2)) 1. Monitoring complies with Method 21 in appendix A of 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The instrument probe is traversed around all potential leak interfaces as closely as possible. Note: The monthly monitoring requirement does not apply to valves subject to alternative standards.	NA	662.034(1)(a)
I. If a leak (instrument reading >= 10,000 ppm) has not been detected for 2 successive months, the valve is monitored during the first month of the next quarter until a leak is detected. (NR 665.1057(3)(a)) Note: Does not apply to valves subject to alternative standards.	NA	662.034(1)(a)
J. If a leak is detected, the valve is monitored monthly until a leak is not detected for 2 successive months. (NR 665.1057(3)(b)) Note: Does not apply to valves subject to the alternative standards.	NA	662.034(1)(a)
K. First attempt at repair is made within 5 calendar days of detecting the leak. (NR 665.1057(4)) 1 leak	Y	662.034(1)(a)
L. Repair is made as soon as practicable, but no later than 15 calendar days after detecting the leak, except when the repair is technically infeasible without equipment shutdown. (NR 665.1057(4))	Y	662.034(1)(a)
M. If a leak is detected, the first attempt at repair includes best practices such as, but not limited to, tightening or replacing bonnet bolts, tightening packing gland nuts, or injecting lubricant into lubricated packing. (NR 665.1057(5))	Y	662.034(1)(a)

Section 6: Standards for Valves in Gas or Vapor Service or in Light Liquid Service

N. If the repair is technically infeasible without equipment shutdown, the valve is repaired before the end of the next hazardous waste management unit shutdown. (NR 665.1059(1))	N/A	662.034(1)(a)
O. If repair has been delayed, the valve is isolated from the hazardous waste management unit and the valve does not contain or contact hazardous waste with organic concentrations of >=10% by weight. (NR 665.1059(2))	NA	662.034(1)(a)
P. If valve repair has been delayed, the emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair. (NR 665.1059(3))	NA	662.034(1)(a)
Q. During delayed repair, the purged material is collected and destroyed or recovered in a control device. (NR 665.1059(3)) Note: Complete the inspection form, "Standards for Closed Vent Systems and Control Devices for subch. AA and BB".	NA	662.034(1)(a)
R. If repair of the valves has been delayed beyond a hazardous waste management unit shutdown, BOTH of the following are met: (NR 665.1056(5)) 1. The valve assembly supplies were sufficiently stocked, but depleted at the time of the shutdown. 2. Repair is not delayed beyond the next hazardous waste management unit shutdown unless it occurred within 6 months of the first shutdown.	NA	662.034(1)(a)
S. When a leak in a valve is detected by an instrument reading of >= 10,000 ppm, a weatherproof and readily visible identification is attached to the leaking valve which states ALL of the following: (NR 665.1064(3)) 1. The equipment ID number. 2. The date evidence of a potential leak was found. 3. The date the leak was detected.	NI	662.034(1)(a)
T. The identification on the valve is removed after the valve has been monitored for two successive months and found to be leak-free. (NR 665.1064(3))	NO	662.034(1)(a)

Section 7: Standards for Pumps, Valves, Pressure Relief Devices and Connectors

A. ANY of the following equipment is used at the facility: If NO, go to Section 8. 1. Pumps or valves in heavy liquid service. 2. Pressure relief devices in light liquid or heavy liquid service. 3. Flanges. 4. Other connectors.	Y	
B. The facility has marked each piece of equipment subject to subch. BB standards in a way that distinguishes it readily from other pieces of equipment. (NR 665.1050(3))	Not observed	662.034(1)(a)
C. If evidence of a potential leak is found by visual, audible, olfactory or some other detection method, monitoring is conducted according to ALL of the following within 5 days: (NR 665.1058) 1. Monitoring complies with Method 21 in appendix A of 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The instrument probe is traversed around all potential leak interfaces as closely as possible. Note: This requirement does not apply when the connector is inaccessible or it is ceramic or ceramic-lined.	N/A	662.034(1)(a)

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Section 7: Standards for Pumps, Valves, Pressure Relief Devices and Connectors

D. When a leak is detected in a pump or valve by an instrument reading of >= 10,000 ppm, ALL of the following actions are taken: (NR 665.1064(3)) 1. A weatherproof and readily visible identification marked with the equipment ID number, date evidence of a potential leak was found and the date the leak was detected is attached to the leaking equipment. 2. The identification on the pump may be removed after repair. 3. The identification on a valve can be removed after it has been monitored for two successive months and found to be leak-free.	NA	662.034(1)(a)
E. If a leak is detected, a first attempt at repair is made in 5 calendar days of detecting the leak. (NR 665.1058(3))		662.034(1)(a)
F. Repair is made as soon as practicable, but no later than 15 calendar days after detecting the leak, except when the repair is technically infeasible without equipment shutdown. (NR 665.1057(4))		662.034(1)(a)
G. If a leak is detected, the first attempt at repair includes best practices such as, but not limited to tightening or replacing bonnet bolts; tightening packing gland nuts; or, injecting lubricant into lubricated packing. (NR 665.1058(4))		662.034(1)(a)
H. If the repair is technically infeasible without equipment shutdown, the valve or pump is repaired before the end of the next hazardous waste management unit shutdown. (NR 665.1059(1)		662.034(1)(a)
I. If repair has been delayed, the valve or pump is isolated from the hazardous waste management unit and does not contain or contact hazardous waste having organic concentrations >= 10% by weight. (NR 665.1059(2))		662.034(1)(a)
J. The valve repair has been delayed because the emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair. (NR 665.1059(3))		662.034(1)(a)
K. After delayed repair, the purged material is collected and destroyed or recovered in a control device. Note: Complete the inspection form, "LQG Subch. BB Standards for Closed Vent Systems and Control Devices". (NR 665.1059(3))		662.034(1)(a)
L. If pump repair has been delayed, the repair requires use of a dual mechanical seal system that includes a barrier fluid system. (NR 665.1059(4))		662.034(1)(a)
M. Repair is completed as soon as practicable, but within 6 months of detecting the leak. (NR 665.1059(4))		662.034(1)(a)
N. If valve repair has been delayed beyond a hazardous waste management unit shutdown, the valve assembly supplies were sufficiently stocked, but depleted at the time of the shutdown. (NR 665.1059(5))		662.034(1)(a)
O. Repair is not delayed beyond the next hazardous waste management unit shutdown, unless it occurred within 6 months of the first shutdown. (NR 665.1059(5))		662.034(1)(a)

Section 8: Alternative Standards for Valves in Gas or Vapor Service or in Light Liquid Service

A. The owner or operator elected to comply with the alternative standard of allowing 2% or less of the valves to leak. If NO, go to Section 9. (NR 665.1061(1))	Y	
B. The owner or operator notified the department that they have elected to comply with the alternative standard. (NR 665.1061(2)(a))	Y	662.034(1)(a)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not ApplicableND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown
Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Section 8: Alternative Standards for Valves in Gas or Vapor Service or in Light Liquid Service

C. Except for valves that have no detectable emissions or valves that are designated as unsafe-to-monitor or difficult-to-monitor, a performance test was conducted by monitoring each valve in gas, vapor or light liquid service according to ALL of the following: (NR 665.1061(3)(a), NR 665.1063(2)) 1. Monitoring complies with Method 21 in appendix A of 40 CFR part 60. 2. The detection instrument meets the performance criteria of Method 21. 3. The detection instrument is calibrated before each day of use. 4. Calibration gases consist of zero air (<10 ppm hydrocarbon in air) and a mixture of <10,000 ppm methane or n-hexane in air. 5. The instrument probe is traversed around all potential leak interfaces as closely as possible.	Y	662.034(1)(a)
D. The leak percentage was determined by dividing the number of valves for which leaks are detected (instrument reading of >=10,000 ppm) by the total number of valves within the hazardous waste management unit during the performance test. (NR 665.1061(3)(c)) Note: Only valves with detectable emissions or valves that are not designated as unsafe-to-monitor or difficult-to-monitor should be included in the calculations.	Y	662.034(1)(a)
E. The performance test is conducted initially upon designation, annually and at other times requested by the department. (NR 665.1061(2)(b))	Y	662.034(1)(a)
F. If a leak is detected, the first attempt at repair is made within 5 calendar days of detecting the leak. (NR 665.1061(2)(c), NR 665.1057)	Y	662.034(1)(a)
G. First attempt at repair includes best practices such as, but not limited to tightening or replacing bonnet bolts, tightening packing gland nuts, and injecting lubricant into lubricated packing. (NR 665.1061(2)(c), NR 665.1057)	Y	662.034(1)(a)
H. Repair is made as soon as practicable, but no later than 15 calendar days after detecting the leak, except when the repair is technically infeasible without equipment shutdown. (NR 665.1061(2)(c), NR 665.1057)	Y	662.034(1)(a)
I. If the owner or operator no longer complies with the alternative standards, they notified the department in writing that they will comply with the subch. BB standards for valves. (NR 665.1061(4))	NA	662.034(1)(a)

Section 9: Alternative Standards for Valves in Gas or Vapor Service or in Light Liquid Service

A. The owner or operator elected to comply with alternative leak detection and repair standards for all valves in a hazardous waste management unit. If NO, go to Section 10. (NR 665.1062(1)(a))	NA	
B. The owner or operator notified the department that they have elected to comply with the alternative standards. (NR 665.1062(1)(b))		662.034(1)(a)
C. The facility monitors for leaks according to EITHER of the following schedules: (NR 665.1062(2)) 1. Valves are monitored for leaks once every 6 months after 2 consecutive quarterly leak detection periods have 2% or less of the valves leaking. 2. Valves are monitored for leaks once every year after 5 consecutive quarterly leak detection periods have 2% or less of the valves leaking. Note: Only applies to valves with detectable emissions or valves that are not designated as unsafe-to -monitor or difficult-to-monitor.		662.034(1)(a)

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Section 9: Alternative Standards for Valves in Gas or Vapor Service or in Light Liquid Service

D. If the percentage of leaking valves is 2% or greater, the facility returns to more frequent monitoring as described below: (NR 665.1062(2)(d)) 1. Monthly monitoring is resumed. 2. When a leak is not detected for 2 successive months, the valve is monitored quarterly. 3. The facility has resumed monitoring every 6 months or every year according to the alternative standards. Note: Applies to valves with detectable emissions or valves that are not designated as unsafe-to-monitor or difficult-to-monitor in the calculations.	NA	662.034(1)(a)

Section 10: Test Methods and Procedures

A. The generator determines whether each piece of equipment contains or contacts a hazardous waste with an organic concentration of >= 10% by weight using ANY of the following: (NR 665.1063(4)) 1. ASTM method D2267-88, E169-87 or E260-85. 2. SW-846 meethod 9060 or 8260. 3. Applying knowledge of the nature of the hazardous waste stream or the process by which it was produced.	Y	662.034(1)(a)
B. If the owner or operator initially made a determination that a piece of equipment contained or contacted hazardous waste with organic concentrations of >= 10%, that determination is revised only after analysis by the ASTM or SW-846 methods stated in Question 10.A. (NR 665.1063(5))	NA	662.034(1)(a)
C. Samples used to determine the percent organic content are representative of the highest total organic content hazardous waste expected to be contained or in contact with the equipment. (NR 665.1063(7))	NA	662.034(1)(a)
D. To determine if pumps or valves are in light liquid service, the vapor pressures of constituents are obtained by standard reference texts or ASTM method D2879-86. (NR 665.1063(8)) According to Facility	Y	662.034(1)(a)

Section 11: Recordkeeping and Reporting

A. If more than one hazardous waste management unit is subject to subch. BB, records for the different units are kept in one record keeping system in a way that each hazardous waste management unit record is identified. (NR 665.1064(1)(b)) Note: Connectors that are inaccessible or ceramic are exempt from all recordkeeping and reporting requirements, per NR 664.1058(5).	Y	662.034(1)(a)
B. ALL of the following information is recorded into the facility operating record for each piece of equipment subject to subch. BB: (NR 665.1064(2)(a)) 1. Equipment ID number and hazardous waste management unit ID. 2. Approximate locations within the facility, such as on a facility plot plan. 3. Type of equipment (e.g. pump or valve). 4. Percent-by-weight total organics in the hazardous waste stream at the equipment. 5. State of the hazardous waste at the equipment (e.g. gas, vapor, liquid). 6. Method of compliance with the standard (e.g., monthly leak detection and repair).	ND	662.034(1)(a)

LARGE QUANTITY GENERATOR INSPECTION - SUBCH. BB REQUIRMENTS FOR EQUIPMENT LEAKS

Section 11: Recordkeeping and Reporting

C. When a leak is detected in a pump, compressor or valve, ALL of the following information is recorded in an inspection log. (NR 665.1064(4)) 1. Instrument and operator ID numbers and the equipment ID number. 2. Date evidence of a potential leak was found. 3. Date the leak was detected. 4. Dates of each attempt to repair the leak. 5. Repair methods used in each repair attempt. 6. "Above 10,000" if that is the maximum instrument reading measured after the repair attempt. 7. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days from discovery of the leak. 8. Documentation supporting the delay of repair of a valve. 9. The signature of the owner or operator who decides the repair could not be effected without a hazardous waste management unit shutdown. 10. The expected date of successful repair if the leak is not repaired within 15 calendar days. 11. The date of successful repair of the leak.	NA No leaks Detected	662.034(1)(a)
D. Information regarding leaks in pumps, compressors or valves is kept for at least 3 years. (NR 665.1064(12))	Y	662.034(1)(a)
E. ALL of the following information for all equipment subject to subch. BB is kept in the operating log: (NR 665.1064(7)) 1. List of ID #'s for all equipment, except welded fittings, subject to subch. BB. 2. List of ID #'s for pumps in light liquid service, compressors, or valves in gas or vapor service or in light liquid service designated for no detectable emissions (instrument reading of <500 ppm above background). 3. Designation of the equipment as having no detectable emissions is signed by the owner or operator. 4. List of equipment ID #'s for pressure relief devices operated with no detectable emissions. 6. Dates of each compliance test for no detectable emissions. 7. Background level measured during each compliance test. 8. Maximum instrument reading measured at the equipment during each compliance test.	Y	662.034(1)(a)
F. For valves designated as unsafe-to-monitor or difficult-to-monitor, the following information is recorded in the operating log: (NR 665.1064(8)) 1. List of ID #'s. 2. Explanation for each valve stating why the valve is unsafe to monitor or difficult to monitor. 3. Plan for monitoring each valve.	NA	662.034(1)(a)
G. For valves complying with the alternative standards for skip period leak detection and repair, the monitoring schedule and percent of valves found leaking during each monitoring period are recorded in the operating record. (NR 665.1064(9))	Y	662.034(1)(a)
H. For pumps and compressors, ALL of the following information is recorded in the operating record: (NR 665.1064(10)) 1. The criteria that indicates failure of the seal system, the barrier fluid system or both. 2. An explanation of the design criteria. 3. Any changes to these criteria and the reasons for the changes.	NI	662.034(1)(a)

Rust-Oleum Corporation
Pleasant Prairie Plant
Safety Policy 041

Incident Response Procedures

I. Revision Log

This procedure may only be changed with the proper approval authority as outlined in SP-030 Management of Change. Below is a history of the changes made and the date they became effective.

Date	Revisions
2/23/94	Updated
4/16/98	Original Controlled Version - includes general update from previous uncontrolled versions.
10/28/98	Revise Incident Commanders. Add Master headcounters.
1/31/00	General revisions – update phone numbers.
5/9/00	Update Phone Listings and area code change.
8/13/01	Update Phone Listings, head counters, and Incident Commanders
3/15/02	Update Appendix A (phones/addresses), Incident Commanders, & Head Counter Section
5/15/02	Update Phone Number for a Primary ERT Member, and to include Distribution Center's Emergency Evacuation Plan.
12/4/02	Update Waste Stream Section (V.3.) to indicate there are other waste streams involved, Update Head Counter Section, and Changed Traffic Supervisor to Receiving Supervisor in Section V. 5. i) which references requesting incoming traffic to hold off from coming to facility due to emergency.
1/31/03	General Update & Added Sump Pit information in Appendix C Section
6/17/03	Updated outside Assembly area groups, adding Sierra (S10) and Utilities (P25) Updated headcounters and Incident Commanders. Added another responsibility to the headcounter; volunteers near both driveway entrances to warn visitors of evacuation. Added information to call SIMPLEX GRINNELL rather than PP Safety Building when taking system "off-line". Added reference in the Appendix section, that the sump information is also available in *EP-10 Sumps to the Environment*. In the sump section, "Shipping" area was changed to "Salvage & Components" area.
8/21/03	Added HW Drawings to SP-041 Appendix B.
12/22/03	Added Beth Caylor's number in Communication Requirements section. Call her (Environmental Health and Safety Manager) if an EPA "Reportable Spill" occurs. Added reportable spill table (page 7) and information on how to complete a spill report (page 8 and 9).
6/1/04	Updated headcounters, phone numbers, addresses, Facility Coordinators. Updated for Matrix Review. Deleted "Distressed Aerosol Cans" in Waste Stream section. Added the "Tri-Clover" address to SERC section.
7/8/04	Updated "Equipment Interlocked with Alarm System" on pages 13 & 14.
1/28/2005	Clarifying ERT Incident Response Assignment and Adding "Fire System Impairment" Notification. Also updated DC's 1st Shift Facility Incident Commander.
3/7/2007	Updated overall procedure.
3/18/2009	Updated contact listing, removed DC information from procedure, added SET Environmental as Emergency Spill Response Contact and updated listing of equipment FAR controlled.
7/26/2012	• Updated Plant Emergency Contacts • Combined SP-045 & SP-048 to this policy • Took out the Reference of SCBA and Level B protection • Added the electronic path for list of First Responders • Changed the overall formatting of the policy • Added description of "incipient" fire as a fire that can be extinguished with one fire extinguisher or less. • Took out reference of alarm codes on ID Badges • Took out how employees get paid if the facility is not able to return to production activities
9/17/2014	• Updated Plant Emergency Contacts • Reviewed TABLE ONE
5/11/2016	• Updated Plant Emergency Contacts • Reviewed TABLE ONE • Updated hazardous waste locations

II. Purpose and Applicability

A. Rust-Oleum Pleasant Prairie facility is dedicated to the protection of its employees from emergencies such as tornados and fires. When emergencies do occur, our Incident Response Procedure (IRP) is initiated. This IRP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

B. OSHA's Emergency Action Plan requirements, found in 29 CFR 1926.35, require Rust-Oleum Pleasant Prairie Facility to have a written emergency action plan (EAP). This EAP addresses emergencies that our company expects may reasonably occur.

C. The IRP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

D. This plan describes the strategies for responding to foreseeable emergencies, which place people and the environment at risk of acute harm. The plan also contains important information about the facility, names and telephone numbers of individuals that may be critical for executing the emergency actions described in this plan.

E. The first section of this plan gives general plant information and contacts.

III. Site & Facilities Identification:

Rust-Oleum Pleasant Prairie Manufacturing Facility
8105 95th Street
Pleasant Prairie, WI 53158

Latitude: 42.532461
Longitude: -87.9058289

Main Phone Number: 262-947-7220

The Plant is further identified by:

The Standard Industrial Classification Code(s): 2851

The USEPA Hazardous Waste Generator #: WID988575452

WI Department of Natural Resources ID #: 230072040

State Air Operations Permit Number: 230072040-ROPA

Storm Water Permit Number: WI-S067857-3 (Tier II General Permit)

IV. **Plant Emergency Contacts**

In the case of an actual emergency, the following Rust-Oleum personnel have the authority to commit the resources and the personnel to contain and control an emergency. Persons first responding to an emergency should contact at least one of the Rust-Oleum individuals listed in the table below.

NAME	TITLE	OFFICE EXT.	CELL PHONE	HOME PHONE / CELL
PLANT OPERATIONS:				
Chris Monroe	Production Manager	x6700	262-220-4672	847-625-8849
Ken Clusman	Plant Manager	x6709	262-909-7082	262-909-7082
MANUFACTURING SUPERVISORS:				
Ismael DeLaRosa	Shipping & Receiving Supervisor	x6825	262-308-2426	
Neil Gorski	Sr. Production Supervisor	x6774	262-237-9418	773-545-8724
Brian O'Neal	A Shift Production Supervisor	x6736	262-909-5280	
Pat Birch	B Shift Production Supervisor	x6816	815-600-5706	
Jim McConaghy	C Shift Production Supervisor	x7422	847-951-6093	847-356-3026
Bob Brothen	D Shift Production Supervisor	x6735	262-818-2473	262-657-7274
Mark Kenney	Senior Production Supervisor	x6785	262-496-7384	
ENVIRONMENTAL & SAFETY				
Joe Urban	EHS Manager	x6853	262-749-0734	773-617-1211
Dave Herrington	VP EHS	x2324	897-915-1667	NA
MAINTENANCE & ENGINEERING				
Jeff Lambert	Engineering Mgr	x6740	262-496-7305	262-220-4631
Willie Vega	Maintenance Mgr	x6748	262-496-7192	262-220-2374
Jeff Fisher	Maintenance Supervisor	x6755	262-620-1470	262-539-6024
PR CONTACT				
Steve Duquaine	HR Director	x6706		847-544-8772
CORPORATE CONTACT				
Mike Murphy	Corporate Counsel	x2226	NA	NA
Steve Gillmann	VP Human Resources	x2453	NA	NA

OUTSIDE AGENCY CONTACTS		
Pleasant Prairie Police and Fire Department:	For any Emergency	**911**
National Response Center (NRC)	For any Chemical release to the environment greater than Reportable quantity	**800-424-8802**
State Emergency Response Center (SERC)	For any Chemical release to the environment greater than Reportable quantity	**608-266-3232**
Kenosha County Office of Emergency Services	For any Chemical release to the environment greater than Reportable quantity	**262-605-7900**
Wisconsin Spill Hotline	For any Chemical release to the environment greater than Reportable quantity	**800-943-0003**
Simplex	Alarm Company	888-746-7539
Matrix Risk Consultants	For any fire impairments or valve closures regardless of duration.	(937) 886-0000 or (888) 4IMPAIR
PP Fire & Rescue	Non Emergency #	262-694-8027
SET Environmental	**Large Spills** beyond the capability of the IRT team to clean up. ***Spill Hotline:***	877-437-7455
OSHA Emergency Line:	For major injuries	800-321-OSHA 800-321-6742

V. **Implementation** - The provisions of this plan shall be implemented immediately in the event of a fire, explosion, or discharge of hazardous waste or hazardous material, which could threaten human health or the environment.

VI. **Manufacturing Facility's Plan**

A. **Facility Incident Commander** (***Emergency Commanders***)**:** The facility incident commander is responsible for coordinating all emergency response measures. The facility incident commander shall be thoroughly familiar with all aspects of this contingency plan, all operations activities at Pleasant Prairie, the location and characteristics of hazardous waste, the location of manifests in the facility, the storage location of chemicals, location of SDS's and the facility layout. The Pleasant Prairie EHS Manager has the list of the names, addresses and phone numbers of the facility incident commanders.

B. **Facility Layout:** The facility is an approximate 250,000 square foot, two-floor facility on a 29-acre site. The first floor consists of Administrative Offices, Cafeteria, Locker Rooms, Filling and Packaging Department, Raw Materials Warehouse, Bulk Liquid Storage, Maintenance Department, Finished Goods Warehouse and Salvage/Components Department. The second floor consists of the R&D office and laboratory, Quality Control Department and Milling Department. A chain link/barbed wire fence for security surrounds the manufacturing and warehouse section of the building. Gates are closed and locked when no personnel are on site. There is a fire lane that encircles the facility. See the maps included in following pages.

C. **Waste Stream:** Three major types of hazardous waste are generated at the facility,

	Hazardous Waste	*HW Number*
1.	Pumpable Sludge (flammable)	F003
2.	Nonpumpable Sludge (flammable)	F003
3.	Spent Caustic (KOH)	D002

These waste streams & others are further described along with labeling requirements in procedure EP-002.

D. **Evacuation Plan**

1. **General Shutdown:** The Incident Response Team will respond to all emergencies including on-site fires, danger from fires from an outside source (fire on an adjacent property) and spills. Each Department Supervisor is responsible for the department's shut down, directing an orderly evacuation and establishing an accurate department head count. The IRT Incident Commander assumes command of plant resources during an emergency.

2. **Department Shutdown:** *If it is safe to do so*, all equipment must be shut down, valves closed, mill/tubs/tanks covered, agitators turned off, dock doors closed and fire doors closed AFTER associates have exited the department. The Department Supervisors are responsible for a safe Department Shutdown.

3. **Alarm Codes** (used for fires and spills): The facility is broken into 7 zones. The alarm consists of repetitive beeps corresponding to the zone **where the fire is located**. Listings of the codes are posted throughout the facility. The codes are:

Zone 1 - Salvage & Components, Maintenance & R&D Concrete Lab	1/1/1/1/1/1
Zone 2 - Filling & Packaging (Includes Sierra)	2/2/2/2/2/2
Zone 3 - Milling & Shading/Mfg. Support Labs	3/3/3/3/3/3
Zone 4 - Receiving & Utilities	4/4/4/4/4/4
Zone 5 - Front Offices, first and second floor	5/5/5/5/5/5
Zone 6 - Pump House Water Flow	2/3/2/3/2/3
Zone 7 - Fire Pump Running	1/2/1/2/1/2

In the event of a facility evacuation all associates who do not have emergency response responsibilities are to leave the building immediately and go to their department assembly area.

4. **Assembly Areas:**
   a. All assembly locations are marked by number and are at the furthest point in the southeast employee parking lot away from the building.

   b. The main headcounter for the evacuation will ask for 2 volunteers to stand near the 95th Street driveway entrance and 2 volunteers to stand near the 80th Avenue driveway entrance. During this time, the volunteers are to advise all visitors against entering the building due to the evacuation.

   c. The list of headcounters is available in the M drive folder, following this electronic path: M:\PP Continuous Operations Select the most recent list which is titled IRT Headcount - Evac List

d. Groups must not congregate in the fire lanes or in the street.

e. No running is allowed unless an associate is in immediate danger.

f. There is no smoking allowed in the parking lot.

g. Departments should assemble in the area marked by the number listed below.

Assembly Areas:

#1 R&D, P400, and Tech Services
#2 P220 / P250
#3 P230
#4 P240 / P300
#5 Open
#6 P150 / G101 / P420 / L200 / K100 / Visitors/Contractors
#7 P510
#8 P840
#9 Open
#10 Incident Response Team (if not involved in remediation)

REMINDER:	The alarm system also serves as the internal Tornado Siren. The Tornado siren is a long, continuous tone, not the short, numbered beeps sounded to trigger an evacuation. When the Tornado Siren is heard, the assembly areas are NOT outside; everyone assembles *inside*, in the Men's Locker Room. See the section entitled "In Case of a Tornado" for details about the internal tornado siren.

VII. In case of Fire

A. The associate who first discovers a fire (open flames or dense smoke) will pull the closest fire alarm box. And, **if trained** *on the use of a hand held fire extinguisher within the last year*, the associate should attempt to put out a fire only if it's still in the **incipient** stage (fire can be extinguished with one fire extinguisher or less).

B. When an alarm sounds, members of the IRT (Incident Response Team) go directly to the location of the fire. If additional external resources are required, the IRT Incident Commander is responsible for getting the resources. The IRT Incident Commander directs the activities of the team and coordinates Rust-Oleum activities with the Pleasant Prairie Fire Department. Incident Commanders will assign an IRT member with a wireless communication device to coordinate activities with the PP Fire Department.

C. IRT members will assess the fire. If the fire is still in the incipient stage, then the IRT will extinguish the fire with portable fire extinguishers. If the fire progresses beyond the incipient stage, the IRT will evacuate the area. If the response team needs to evacuate, they will meet as a group in the southeast employee parking lot.

D. The department supervisors and non- response team associates will shut down each department if it is safe to do so and then evacuate through the closest door in the direction away from the fire. The supervisor of the department where the fire is located will remain and act as a consultant for details as needed. All departments will assemble in the southeast employee parking lot at their designated assembly areas. DO NOT CONGREGATE IN THE FIRE TRUCK LANES.

E. Rust-Oleum associates will only fight a small incipient stage fire. If the fire is already past the incipient stage, the evacuation procedure should be activated. The shift Incident Commander will provide guidance on when the fire response team should attempt to fight the fire or evacuate.

F. The sprinkler system is maintained in a "READY" status. The IRT Incident Commander will assign an IRT member as needed to monitor sprinkler system and control the Fire Pumps as needed. The Pleasant Prairie Fire Department will have the final say on when the sprinkler systems should be shut off. All mechanics are to be familiar with these operations.

G. Department headcounters will get a list of all present associates working in his/her department before leaving the department. The headcounter verifies that all associates in the department are present at the assembly area and gives the count to the Primary Headcounter. There are Primary Headcounters and Backups for each of the three shifts.

Note: If neither the primary, nor backup headcounter is present, then the most senior Associate in the gathering area will be responsible for coordinating the department headcounters and relaying information to the IRT Incident Commander or Fire Department Incident Commander.

H. The headcounter will compare the department headcount with the "FIRELIST" and inform the Incident Commander of all missing people. The Incident Commander will notify the Fire Department of the missing people. The fire department will then take over rescue efforts of the missing people.

I. The fire department will tell the Incident Commander when it is safe to reenter the building. The Incident Commander will give the "all clear" when all are free to reenter the building. Under no circumstances should any associate reenter the building until the "all clear" is sounded. The plant will not resume normal operations without the sprinkler system on line.

J. RUNNING IS **NOT** ALLOWED unless an associate is in immediate danger.

VIII. In Case of a Tornado

A. Tornados are local storms of high speed winds which usually rotate, up to 200 miles per hour, in a counter clockwise direction, occur during thunderstorms, and move from the south, southwest or west at a speed of 30 to 50 miles per hour. Tornados form when layers of air of contrasting temperatures, density, moisture, and wind flow come together. These contrasting layers of air create complex energy transformations, leading to the tornado vortex. The destruction of a tornado is caused its strong rotary winds, the impact of flying debris and the partial vacuum in the center of the vortex. In the Midwest, tornados typically occur in the spring and summer, when seasonal changes bring contrasting weather fronts together and when the warmer summer climate induces strong thunderstorms. However, tornados can occur at anytime of the year when contrasting fronts come together.

B. When weather conditions are conducive for tornadoes, the National Weather Service will issue one of two bulletins:

1. Tornado **WATCH**
   Tornados and severe thunderstorms are **possible**. All supervisors and managers will be notified by the Senior Associate or Incident Commander to prepare for a possible tornado warning. For local weather information, the Senior Associate or Incident Commander will designate a person to:
   - Locate following Internet website: "**NOAA.gov**". Click on "**Current Weather/Warnings**". Enter Pleasant Prairie, WI and click GO. Click on **Hazardous Weather Outlook**. Or,
   - Listen to the local radio station WIIL-95.1 FM to receive information on the status of the storm.

2. Tornado **WARNING**
   - Tornados have been **detected or spotted**. Persons close to the storm should be prepared to take shelter immediately. If the National Weather Service has issued a TORNADO WARNING,
   - The shift Senior Associate or Incident Commander will position himself in the facility so he can hear the Pleasant Prairie local tornado alarms.

C. **Kenosha County Emergency Services** will sound the local tornado alarms if any tornado is sighted in the vicinity.

1. This "outside" alarm cannot be heard throughout the Pleasant Prairie manufacturing facility, so the facility alarm system will be used to alert all associates that a tornado has been sighted in the immediate vicinity.

2. The alarm will be manually activated. The manufacturing facility's alarm will be a long continuous tone, lasting 15 seconds. This manufacturing signal **will sound three times**.

D. Equipment Shutdown- If the facility tornado alarm sounds, all equipment in the manufacturing facility will be shut down per equipment emergency shutdown procedures and all doors will be closed.

E. Tornado Shelter - All associates and visitors will congregate in the Men's Locker Room. Associates are asked to gather by group near their designated "Area #" sign posted in the locker room. This will allow easier determination of missing individuals. All associates must remain in their designated area until the headcounter accounts for them.

F. A portable first-aid kit and four flashlights are stored in a locker #151. The Production Manager has the combination and he has also given the combination to supervisors in case these items are needed in a real emergency. Additional first aid kits are located in the electrical closet of the front office and the department supervisors' offices.

G. The Senior Associate or Incident Commander will manually activate the facility alarm when the Kenosha County Emergency Services Office activates the local tornado Siren. In the absence of the Senior Associate or Incident Commander, a member of the IRT or their designee will sound the Tornado siren and ensure that all workers on site are aware that they need to proceed to the shelter area. To activate the facility alarm at the Manufacturing Facility:

1. The facility alarm is located on the front panel in the lobby. There are three sections of the panel. The alarm is located on the lower left, middle section. It is labeled "Manual Evacuation" and has a security collar around it to avoid accidental activation.

2. With a pen or pencil, press the alarm button for at least three seconds to activate the alarm. Let it sound for about 15 seconds, then press the "Alarm Silence" button.

3. Allow about 5 seconds of silence. Activate the "Manual Evacuation" alarm again for another 15 seconds, and then press the "Alarm Silence" button.

4. Repeat one more time. Go to the locker room until an **"all clear"** signal has been issued by the Kenosha County Emergency Services Office or has been heard on the local radio station.

H. The Senior Associate or Incident Commander or his or her designate will listen to the local news station, FM 95.1, and/or public emergency channel to listen for an "All Clear". It is emphasized that ALL associates should remain in the shelter area **until an all clear is given by the Senior Associate or Incident Commander**.

1. The Primary Head Counter will receive accountability reports from each department, based on department head counts taken at the start of each shift.

2. Visiting Contractors will maintain an attendance roster for each shift they are present. Each Contractor supervisor will report the attendance roster to the Primary Head Counter.

3. Visitors must report to their Rust-Oleum Corporation representative, so they can be accounted for. In the event of a visitor not having a designated representative, the visitor will report to the front desk receptionist or to the locker room.

4. The front desk receptionist will be responsible for accounting for visitors without a Rust-Oleum Corporation contact. The Rust-Oleum Corporation representative and/or front desk receptionist shall give the Primary Head Counter an accountability report on the status of any visitors.

I. Once the "all-clear" is given by the local news station, the Senior Associate or Incident Commander will alert all associates and allow them to return to their work areas.

J. At no time shall anyone leave the shelter until the Senior Associate or Incident Commander gives the plant the "All-Clear".

K. Each department has an accountability system for their area. The accountability system should be developed to account for every associate in the department in case of a fire, tornado or hazardous chemical release. The system should be completed at the beginning of each shift.

L. In the event of an emergency, each department will report to the Primary Head Counter those individuals who are accounted for and those who are not.

M. Contractors:

1. Visiting contract firms will establish an accountability system for their employees. The accountability system should be developed to account for every contract employee in the plant during an emergency. One such system can be a simple checklist of all contract employees that are present during a specified shift. The checklist should be completed at the beginning of each shift. Contractors are responsible for maintaining an accurate head count of their employees at all times while on the Pleasant Prairie premises.

2. In the event of a facility tornado alarm, contract firms will immediately shut down their operations and extinguish all ignition sources and power down any potential ignition sources. The supervisor of the contracting firm will proceed to the locker rooms, where they will give the Primary Head Counter an accountability report on the status of their employees.

N. Visitors:

1. Visitors to Pleasant Prairie's manufacturing facility must sign-in at the front desk when they arrive on the premises and sign-out when they are leaving, even when they are leaving temporarily. It is the responsibility of the visitor's Rust-Oleum Corporation contact/representative to ensure the safety of the visitor. This entails ensuring the accountability of their visitor at all times and restricting the visitor's access to areas of the plant.

2. Visitors at the Manufacturing Facility will proceed to the locker rooms with their Rust-Oleum Corporation contact/representative.

IX. In Case of a Power Outage

A. Power Outages will take the entire facility to a "DOWN" status. Emergency power is provided to the computer room via a UPS system and emergency lights will function on battery power.

B. In case of power outage complete the following steps:

1. Close valves to prevent paint from leaking or overflowing fill boxes.

2. Turn equipment to off position if safe to do so.

3. Ensure that all dock doors and outside doors are closed – especially if in cold weather.

4. Have employees move slowly to the cafeteria area or other lit area.

5. Contact Simplex Grinnell, our alarm monitoring service, at (888) 746-7539 and explain that we have lost all power and our alarms are off-line. (Our account number is 202-2737.)

6. A Maintenance Associate or Supervisor should periodically walk through the plant with a flashlight to ensure that all equipment is left in a safe status.

7. Check the power feed to the plant to determine if the problem is on site or with the Power Company.

8. Call the Emergency Power Outage phone number to report the outage and get information as to when we can expect power to resume.

WE Energies Emergency Power Outage:	1-888-779-6881
WE Energies account representative: Jim Ward	1-414-745-5035

9. The phones should remain functional at least as long as the UPS to the computer room lasts. If the phones are not functional, try the front office fax phone line – it is a separate line, not part of the phone network. If no phones work, find a cell phone to report the outage.

10. The UPS backup power to the computer room will only last for 30-60 minutes. The remaining power is displayed on the front of the UPS. If the power is going to be down for a longer period, call the computer room at VH and turn off the computers in a controlled shutdown. The VH help desk number is 2377. The general VH switchboard number is 1-847-367-7700.

11. If the power is to remain off for an extended period, management will make a decision on the rest of the workday.

12. If the power is out for an extended period during cold weather, watch out for freezing pipes – particularly near outside walls and in the out-buildings. If possible, drain dead-legs if needed before they freeze.

C. **When power returns**:

1. Contact Simplex Grinnell, our alarm monitoring service, at (888) 746-7539 account number 202-2737 to let them know we are back on line.
2. All Associates should return to their work sites.
3. Check all equipment to ensure that it is operational and in the correct power status. Report all problems to Maintenance.

X. In Case of a Spill:

A. The operator or an associate in the immediate vicinity who observes a spill will first check the spill area for immediate hazards (fire, reaction, severe splashing). If the spill is a small quantity <5 gallons and additional Personal Protective Equipment (PPE) is not necessary (based upon the judgment of the employee present in the area), then the employee should stop the source of the spill, notify the shift supervisor immediately. The Shift Supervisor will review the spill and apply the appropriate resources for spill clean-up.

B. If the spill is in a location or amount that requires additional PPE or >5 gallons, then the associate shall notify the department supervisor immediately. The Shift Supervisor will review the spill and apply the appropriate resources for spill clean-up (additional IRT members, their designees or outside services).

C. The IRT will respond to the area and identify and evaluate if the situation is a fire or chemical spill. If a chemical spill, IRT and its designees will secure the area and evacuate the area in which the spill is located. The IRT will evacuate and control any additional areas as necessary.

D. The IRT Incident Commander will take the following steps to remediate the spill:

1. Shut-off all ignition sources in a manner that does not expose the IRT to any hazards.
2. The Incident Commander will establish a response strategy for containment and clean-up. Strategy may involve the IRT, its designees, outside contractor assistance, or the PP Fire Department.
3. In the event of an activated fire alarm or summoning outside assistance, the Incident Commander will designate an IRT member or designee to meet the outside assistance (i.e. fire department) at the front entrance.

4. Upon request, the Incident Commander shall relinquish control of the incident to the PP Fire Department. In such a case, the IRT may assist the fire department if necessary.

E. The following equipment is stored in the IRT supply room is to be used to remediate the spill:

1. Combustible Gas Meter/Oxygen Meter
2. Colorimetric Indicator Tubes
3. Appropriate Gloves
4. Rubber Boots
5. Apron or Polycoated TYVEK Coveralls
6. Goggles, Face shields or Full Face Air Purifying Respirators
7. Access to Water or Safety Shower
8. First - Aid Kit

F. The IRT will utilize the combustible gas/oxygen meter and the Colorimetric Indicator Tube to evaluate the atmosphere. Initial Evaluation shall be conducted in Level C protection. Evaluation will be terminated if atmosphere is above 10% of the Lower Explosive Limit (LEL) and the IRT will re-evaluate the response strategy.

G. IRT will establish Hot and Cold Zones, if necessary:

- The Hot Zone is any area with concentration of airborne contamination above the Permissible Exposure Limit (PEL) or Threshold Limit Value (TLV).
- The Cold Zone will be where the Incident Commander resides.

H. IRT will determine the appropriate level of PPE (Level C, Level D) based on the results of air monitoring.

I. Prior to entering a Hot Zone, the Incident Commander will brief the IRT.

J. The IRT will contain, control and clean up the spill. Continuous monitoring of the atmosphere will occur.

K. The IRT will confirm that the area is safe for re-occupancy through air monitoring. All areas will be confirmed to have airborne concentrations below the PEL or TLV. The IRT Incident Commander will allow re-entry into the area after all waste is secured and air monitoring indicates a safe atmosphere.

L. The IRT will properly dispose of any waste generated according to EP-002, Hazardous Waste Procedure.

M. Plant Management will conduct an incident investigation according to SP-040, Incident Investigation & Reporting.

XI. Communication Requirements:

A. In the event of an emergency (**fire, personal injury, large spills**) the following people/organizations must be notified immediately by the facility incident commander:

Pleasant Prairie Police and Fire Department: 911

Notify the Site EHS Manager and if the Site EHS Manager is not at the plant or is unavailable by Cell Phone, the PP Plant Manager must contact The VP of EHS. If the emergency meets the RPM "Reportable Events Policy" criteria, the EHS Manager or the VP of EHS will contact ***the RPM VP of EHS***. A copy of this RPM policy has been placed in the Safety Manuals for the Plant Manager, the Production Manager and the Maintenance & Engineering Manager.

National Response Center (NRC) 1-800-424-8802

B. If a CERCLA hazardous substance (**See Table One**) is released **TO THE ENVIRONMENT** above its Reportable Quantity (RQ), you must immediately notify the **NRC.** "Immediate reporting" is not defined in the statute, but legislative history states that ordinarily, "delays in making the required notifications should not exceed

15 minutes after the person in charge has knowledge of the release." You should not wait until you calculate the exact quantity released. You should report as soon as you have released a reportable quantity.

C. For releases of CERCLA hazardous substances and EPCRA extremely hazardous substances above the RQ that go beyond your facility's boundaries, you must also immediately notify:

- **State Emergency Response Center (SERC 1-608-266-3232)**
- **LEPC** of any area likely to be affected by the release. **(Kenosha County Office of Emergency Services 262-605-7900)**

D. For immediate notification of a release, call the **Wisconsin Spill Hotline at 800/943-0003**

E. A written follow-up emergency notice must be submitted to the **SERC** and **LEPC of any area likely to be affected by the release**, as soon as possible after the release. The written follow-up should be submitted no more than 7 days from the date of release.

F. The following information shall be reported to the SERC (State Emergency Response Center) or the NRC (National Response Center):

1. Name and telephone number of the person who is reporting;
2. Name and address of the facility;

Rust-Oleum Corporation
8105 95th Street
Pleasant Prairie, WI 53158

3. Phone Number: 262-947-7220 (Mfg)
4. Name and type of incident;
5. Name and quantity of material or materials involved, to the extent known;
6. The extent of injuries, if any; and
7. The possible hazards to human health or the environment, outside the facility.

G. In the event of an occupational death the occupational safety and health administration shall be notified by calling 1-800-321-OSHA (1-800-321-6742). OSHA shall be notified within 8 hours of an occupational-related death.

All accidents (including spills) are preventable; therefore it is expected that the accident and spill reports will include a root cause and corrective action to prevent re-occurrence.

H. To review Reporting Procedures or to report Spills, we need to use the documents in the N drive. Below is a list of paths which will help you locate the correct forms to complete.

Incident Reporting Procedures: use the following path to open and complete the form:
N:\RegShare\Master EHS Management System\Plant EHS-MS\Pleasant Prairie\6.6 - Operational Controls, Best Practices\6.6.7 - Incident Reporting: INCIDENT REPORT FORM F.1A

Spill Report Form: use the following path to open and complete the form:
N:\RegShare\Master EHS Management System\Plant EHS-MS\Pleasant Prairie\6.6 - Operational Controls, Best Practices\6.6.7 - Incident Reporting: SPILL REPORT FORM

XII. **Emergency Equipment** - The following is a list of emergency equipment in the facility:

a. alarm system
b. fire sprinkler system
c. fire extinguishers - class ABC
d. spill containment (supplies available in each department) mops, squeegees, boots, protective suits, absorbent materials, explosion proof 55 gallon air vacuum (Please see Appendix A with the locations and content of Each Spill Kit)

e. air purifying respirators (half mask and full mask)
f. combustible gas/oxygen air monitor
g. two-way radios
h. all roll-up fire doors and tank bottom valves are equipped with fusible link auto - closers.
i. colorimetric indicator tube air monitor
j. explosion suppression system in both gas houses

XIII. Local Emergency Response Agreements:

The Pleasant Prairie Fire Department is the fire company responding to all emergencies at this facility. They are completely familiar with the layout of the facility, the materials used in the manufacturing processes, the fire safety systems, the work areas in the building, and the entrances into the facility. The Pleasant Prairie Fire Department makes routine fire safety inspections of the facility.

Additionally, the Pleasant Prairie Police Department, the United Hospital System, and the Kenosha HazMat Team, are also familiar with the layout and operations of the facility.

The monitoring system service is no longer provided by the Village of Pleasant Prairie Dispatch Center. Effective 3/27/03, we are to call SIMPLEX GRINNELL at 888-746-7539. (a/c #202-2737) The Receptionist or Maintenance Personnel usually make these calls.

- **Routine** Alarm Systems Checks (taking system "offline") – Call Simplex
- In **Emergencies**, call Pleasant Prairie Fire Department on an outside line, 911.
- **Shutdown of the sprinkler system** – Call Simplex (888-746-7539) **AND** PP Fire & Rescue at (262) 694-8027 and ask for the "person in charge".
- Notify **Matrix Risk Consultants** of all **fire impairments or valve closures** regardless of duration. Call (937) 886-0000 or (888) 4IMPAIR.
- An arrangement has been made with **SET Environmental** to handle **Large Spills** beyond the capability of the IRT team to clean up. Spill Hotline: 877-437-7455.

XIV. **Post-Incident Requirements**:

In the event that an emergency situation involves Hazardous Waste material, the following requirements must be satisfied:

a. Provide for treating, storing or disposing of recovered waste contaminated soil or surface water or any other material that results from a discharge, fire or explosion.

b. Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment is clean and fit for its intended use before operations are resumed.

c. The EHS Manager shall notify the Wisconsin Department of Natural Resources, the Regional Administrator, and the Pleasant Prairie Fire Department that the facility is in compliance with paragraph b) before operations are resumed in the affected areas of the facility.

d. The EHS Manager shall note the time, date and details of any incident that requires implementing this contingency plan. Within 15 days after the incident, the facility shall submit a written report on the incident to the Wisconsin Department of Natural Resources. The report shall include:

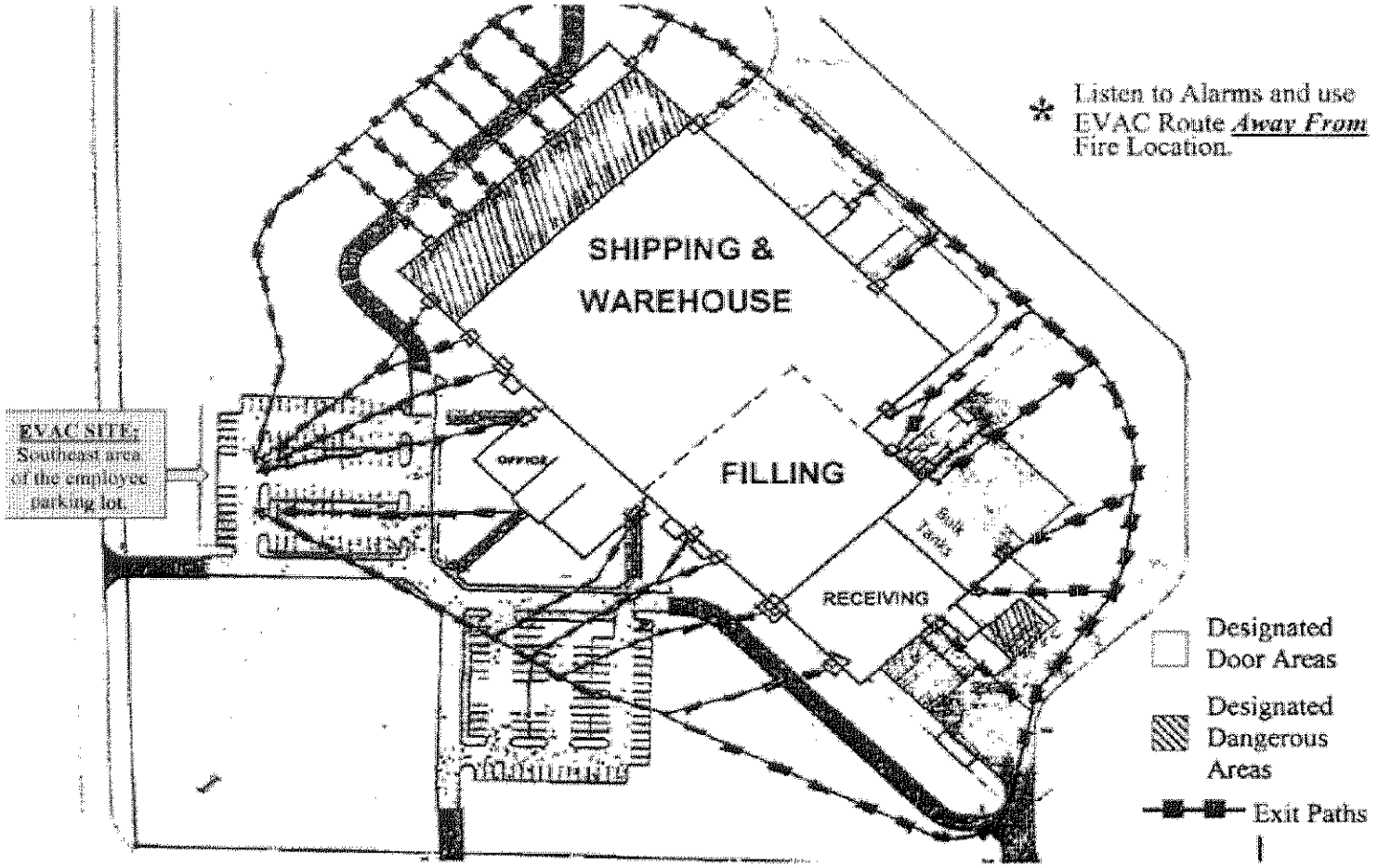
1. Name, address, and telephone number of owner;
2. Name, address, and telephone number of the facility;
3. Date, time and type of incident, such as fire or explosion;
4. Name and quantity of materials involved;
5. The extent of injuries if any;
6. An assessment of the actual or potential hazards to human health or the environment, where this is applicable;
7. A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative shall also describe any necessary measures which have been or shall be taken to prevent incidents in the future; and
8. Any amendments to the contingency plan as required in NR 630.22 (1) (b) and (c).

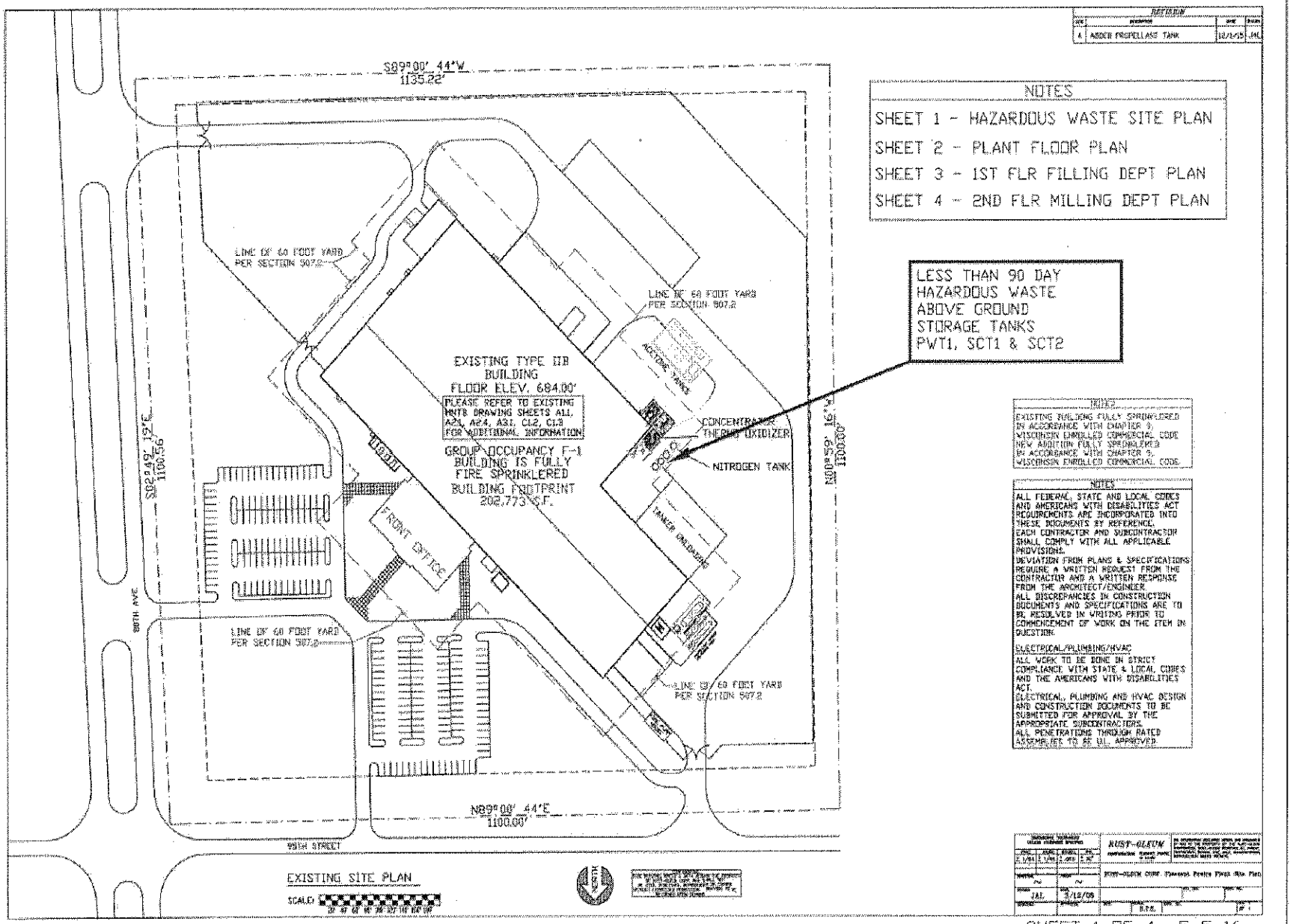
TABLE ONE (Reviewed 8/16/2014)

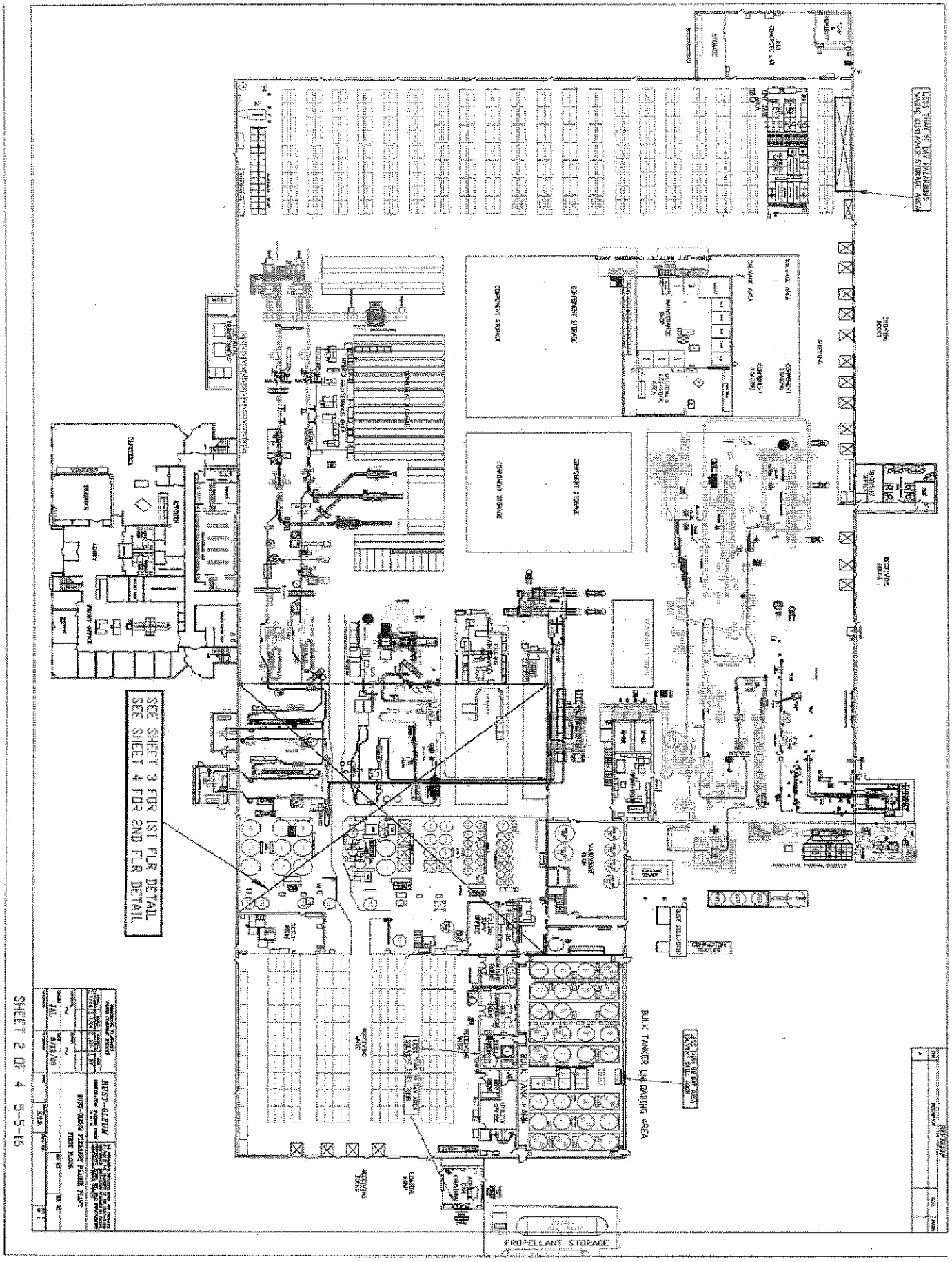
Hazardous Substance	Cas no.	Raw material(s) Found in	Product line(s) found in	Reportable Quantity (RQ) of hazardous substance in POUNDS	LBS/GAL (for haz subst.)	RQ in gallons (for haz substance)
Acetic acid	64197	205621, 8800	9800s, 5300s	5000	8.736	572
ethyl acetate	141786	203923, 5008	7900s, 1900s,204487, 203936, 190994	5000	7.520	665
Acetone	67641	5291	Aerosol products	5000	6.570	761
Ammonia	7664417	205134, 8440, 8441	1900s, 5200s, 7900s	100	7.730	13
Ammonium benzoate	1863634	8901	3000 series	5000	14.658	341
n-butyl phthalate (plasticizer), dibutyl phthalate	84742	205617, 8610	5200s, 8300s, 1980s, 7980	10	8.720	1
Xylene	1330207	203933, 5013, 5040, 5040P, 5042	solvent-based products, aerosols	100	7.260	14
Toluene	108883	5020, 5020P	solvent-based products, aerosols	1000	7.260	138
n-butyl alcohol, 1-butanol	71363	203944, 5240, 5245	5200s, 9100s, 9300s, F0165, F0166, 7870, 7810	5000	6.740	742
MEK	78933	204057, 5301	solvent-based industrial products - epoxies, urethanes	5000	6.710	745
butyl acetate	123864	203931, 5030	9800s	5000	7.350	680
iso-butyl acetate	110190	203932, 204342	204342	5000	7.260	689
butyl benzyl phthalate	85687	205102	1900s, 2100s, 3000s, 3100s, 7200s	100	9.319	11
Copper	7440508	205300, 205301, 2889, 2891, 2895,	1900s, 1714, 7015, 7714, 7710, 8810, 1910	5000	74.619	67
Cyclohexanone	108941	203948, 205437	205437	5000	7.910	632
Ethylbenzene	100414	about 20% of xylene	solvent-based products, aerosols	1000	7.235	138
Ethylene glycol	107211	203965	3000s, 3100s, 5100s, 5800s, 5900s, FA3000s, FA3100s	5000	9.260	540
Formic acid	64186	208547, 3965	209207, 209208	5000	10.080	496
methyl isobutyl ketone, MIBK	108101	203954	high-performance custom coatings, aerosols	5000	6.670	750
Methylene chloride	75-09-2	42151, 42154	Zinsser power stripper	1000	10.97	91
muriatic acid, hydrochloric acid	7647010	3917	7840	5000	9.818	509
methanol, methyl alcohol	67561	203947	2300s, 2500s, 5600s, 9500s, 1900s	5000	6.620	755
phosphoric acid	7664382	210049	1083, 1084, 7840 brush	5000	13.183	379
sodium nitrite	7632000	8900	water-based products, except 2-component epoxies	100	18.056	6
Zinc	7440666	2830, 2836	zinc rich primers, aerosols	1000	8.910	112

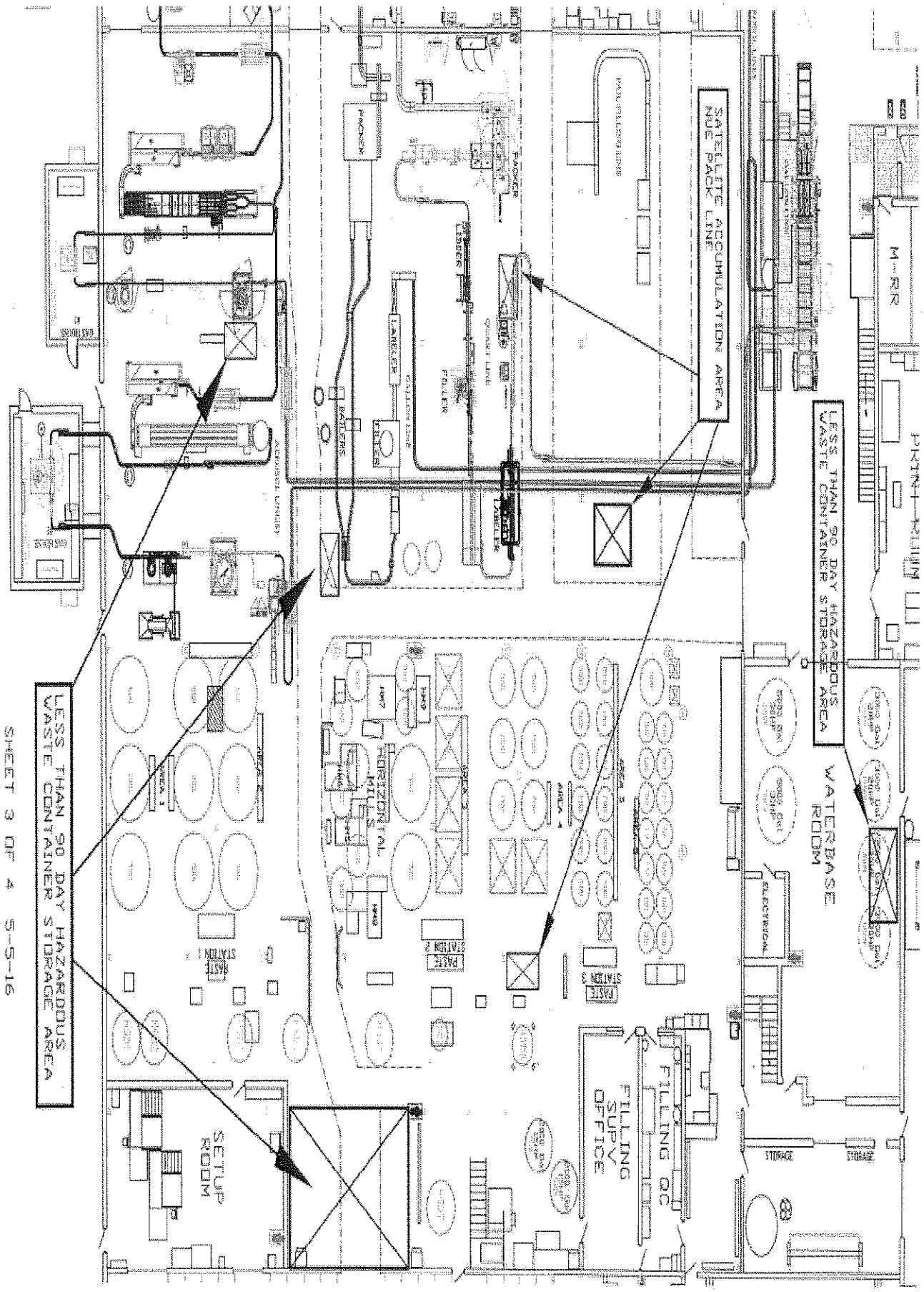
EMERGENCY EVACUATION ROUTES

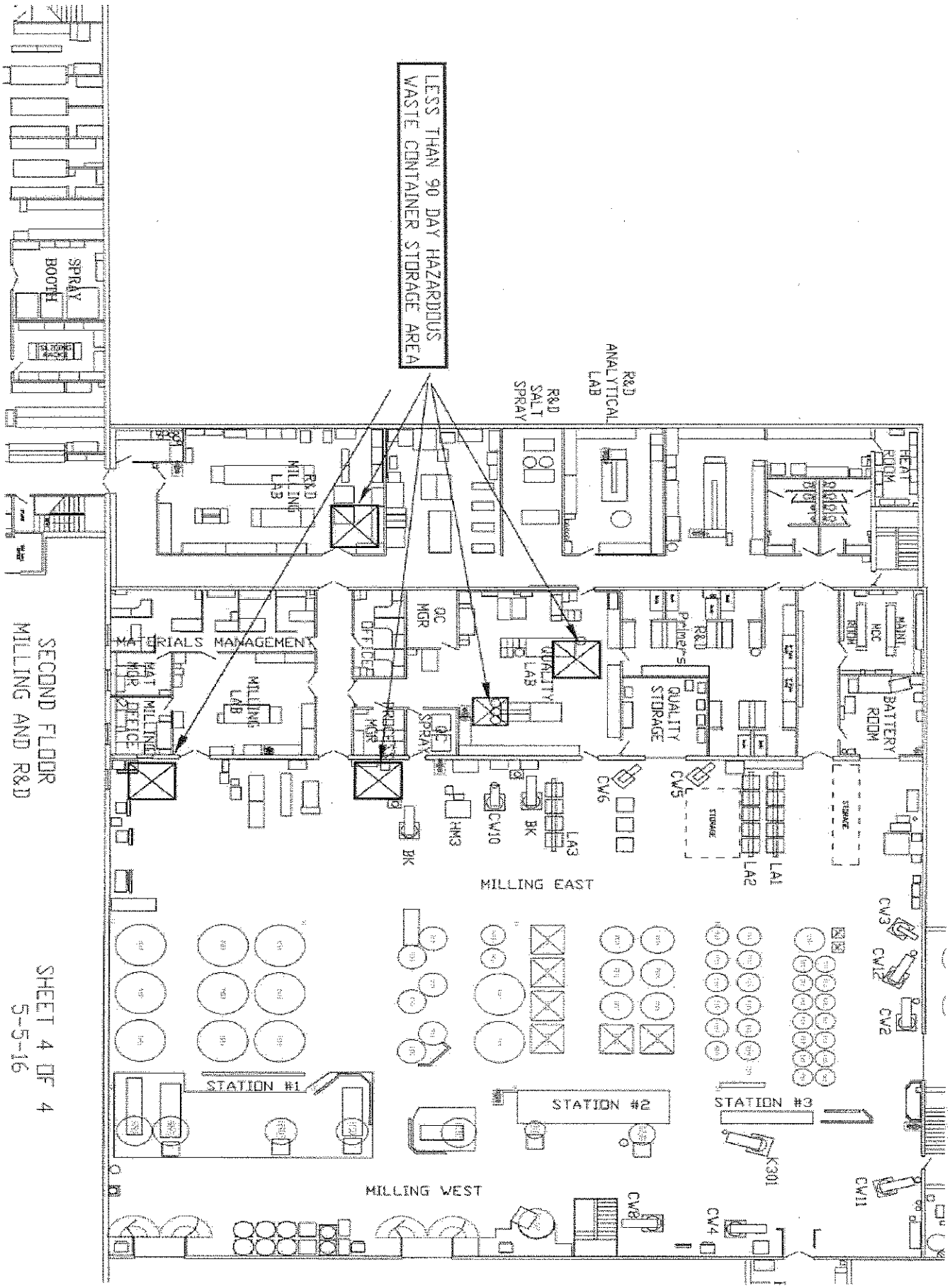
(Includes R&D Concrete Lab and Tech Support Areas, June 2012)




S89°00' 44"W
1135.22'
LINE OF 60 FOOT YARD PER SECTION 507.2
EXISTING TYPE IIB BUILDING
FLOOR ELEV. 684.00'
PLEASE REFER TO EXISTING UNITE DRAWING SHEETS A1.1, A2.4, A3.1, C1.2, C1.3 FOR ADDITIONAL INFORMATION
GROUP OCCUPANCY F-1 BUILDING IS FULLY FIRE SPRINKLERED
BUILDING FOOTPRINT 202,773 S.F.
FRONT OFFICE
ACETONE TANKS
CONCENTRATOR THERMAL OXEDIZER
NITROGEN TANK
TANKER UNLOADING
N89°00' 44"E
1100.00'
N00°59' 16"W
1100.00'
S00°59' 16"E
1100.00'
95TH AVE
95TH STREET
NOTES
SHEET 1 - HAZARDOUS WASTE SITE PLAN
SHEET 2 - PLANT FLOOR PLAN
SHEET 3 - 1ST FLR FILLING DEPT PLAN
SHEET 4 - 2ND FLR MILLING DEPT PLAN
LESS THAN 90 DAY HAZARDOUS WASTE ABOVE GROUND STORAGE TANKS PWT1, SCT1 & SCT2
NOTES
EXISTING BUILDING FULLY SPRINKLERED IN ACCORDANCE WITH CHAPTER 9, WISCONSIN ENROLLED COMMERCIAL CODE
NEW ADDITION FULLY SPRINKLERED IN ACCORDANCE WITH CHAPTER 9, WISCONSIN ENROLLED COMMERCIAL CODE
NOTES
ALL FEDERAL, STATE AND LOCAL CODES AND AMERICANS WITH DISABILITIES ACT REQUIREMENTS ARE INCORPORATED INTO THESE DOCUMENTS BY REFERENCE.
EACH CONTRACTOR AND SUBCONTRACTOR SHALL COMPLY WITH ALL APPLICABLE PROVISIONS.
DEVIATION FROM PLANS & SPECIFICATIONS REQUIRE A WRITTEN REQUEST FROM THE CONTRACTOR AND A WRITTEN RESPONSE FROM THE ARCHITECT/ENGINEER.
ALL DISCREPANCIES IN CONSTRUCTION DOCUMENTS AND SPECIFICATIONS ARE TO BE RESOLVED IN WRITING PRIOR TO COMMENCEMENT OF WORK ON THE ITEM IN QUESTION.
ELECTRICAL/PLUMBING/HVAC
ALL WORK TO BE DONE IN STRICT COMPLIANCE WITH STATE & LOCAL CODES AND THE AMERICANS WITH DISABILITIES ACT.
ELECTRICAL, PLUMBING AND HVAC DESIGN AND CONSTRUCTION DOCUMENTS TO BE SUBMITTED FOR APPROVAL BY THE APPROPRIATE SUBCONTRACTORS.
ALL PENETRATIONS THROUGH RATED ASSEMBLIES TO BE UL APPROVED.
REVISION
A ADDED PROPELLANT TANK 02/14/15 JAL
RUST-OLEUM
EXISTING SITE PLAN
SCALE
JAL 5/18/09
SHEET 1 OF 4 5-5-16


SEE SHEET 3 FOR 1ST FLR DETAIL
SEE SHEET 4 FOR 2ND FLR DETAIL
BULK TANKER UNLOADING AREA
PROPELLANT STORAGE
SHEET 2 OF 4 5-5-16


SATELLITE ACCUMULATION AREA
NUE PACK LINE
LESS THAN 90 DAY HAZARDOUS WASTE CONTAINER STORAGE AREA
WATERBASE ROOM
LESS THAN 90 DAY HAZARDOUS WASTE CONTAINER STORAGE AREA
SETUP ROOM
FILLING QC
FILLING SUPV OFFICE
HORIZONTAL MILLS
STORAGE
STORAGE
SHEET 3 OF 4 5-5-16


LESS THAN 90 DAY HAZARDOUS WASTE CONTAINER STORAGE AREA
SPRAY BOOTH
R&D MILLING LAB
R&D SALT SPRAY
R&D ANALYTICAL LAB
HEAT ROOM
MATERIALS MANAGEMENT
MAT MGR
MILLING OFFICE
MILLING LAB
QC MGR
OFFICE
QUALITY LAB
PRIMER'S
R&D
QUALITY STORAGE
MAINT. REC ROOM
BATTERY ROOM
STORAGE
MILLING EAST
MILLING WEST
STATION #1
STATION #2
STATION #3
BK
HM3
CW10
LA3
CW6
CW5
LA2
LA1
CW3
CW12
CW2
K301
CW11
CW8
CW4
SECOND FLOOR
MILLING AND R&D
SHEET 4 OF 4
5-5-16

XV. **Location and Operation of Sumps that Pump to the Environment**
(This same information exists in *EP-010 Sumps to the Environment* procedure.)

1. **Salvage & Components Area** - Panel located between dock doors 5 & 6. To switch off pumps there are two white three-way toggle switches at the bottom of the panel labeled "pump 1" and "pump 2". Move both switches to "off" (center) position.
   - A secondary shut-off would be in the breaker panel numbered 1H4 by shipping dock door 1. The breaker in position 2-4-6 should be switched to the "off" position.
   - To turn pumps back on, switch the two toggles in the panel to the "auto" (right) position, or the secondary panel breaker back to the "on" position.

2. **Salvage & Components Area** – There is no panel--it is plugged into a wall outlet behind the pit. It is located in the front of the shipping department in front of the fire system risers at the end of the main aisle, starting at dock door 1.
   - Unplug from the outlet to remove power and plug back in to restore power. A secondary shut-off is in panel 1L2 breaker in position 4 on the wall next to the same riser.

3. **Receiving** - Panel located between dock doors 1 & 2. To switch off pumps there are two three-way toggle switches in the center of the panel to the left labeled "pump 1" and "pump 2". Move both switches to "off" (center) position.
   - A secondary shut-off would be in the breaker panel numbered 1H8--the third panel over from the Caustic Room Door in Receiving. The breaker in position 14-16-18 should be switched to the "off" position.
   - To turn pumps back "on" switch the two toggles in the panel to the "auto" (right) position, or the secondary panel breaker back to the "on" position.

XVI. **Equipment** Interlocked with Alarm System:
Some equipment automatically shuts down when an alarm sounds. This equipment list is maintained as part of the PSM Program.

Appendix A

Rust-Oleum Corporation
Pleasant Prairie Plant
Safety Procedure 043

Spill Kit Contents

I. Revision Log

This procedure may only be changed with the proper approval authority as outlined in SP-030 Management of Change. Below is a history of the changes made and the date they became effective.

Date	Revisions
4/30/99	Original Controlled Version
4/20/2013	Updated Department and contents of the Spill Kits

II. Procedure:

This procedure lists the contents and locations of all of the spill kits in the plant. The spill kits are audited monthly to ensure that they are available and complete. The Department Supervisor of the department where the spill kits are located is responsible for ensuring that the audits are completed every month.

III. Spill Kit Locations

XVII.

Department	Type of Spill Kit
P220-Milling	Biocide (8338)
P250-Receiving	Biocide (8338)
P220-Milling	Scavenger (4934)
P250-Receiving	Scavenger (4934)
P220-Milling	General
P230-Filling	General
P250-Receiving	General
P260-Shipping	General
P510-Maintenance	General
Each Dept First Aid Station	Blood

IV. Spill Kit Contents

A. Biocide Decontamination Kit (Kathon LX 1.5%) Raw material code 8338.

1. Sodium Metabisulfite (to be prepared into a 10% solution in water).
2. 3 Rope type absorbant pigs.
3. Five Wiper pads.
4. Solution Mixing container.
5. Spill cleanup and decontamination instructions.
6. 1 Pair nitrile gloves.

7. One rubber fronted apron.
8. 5-gallon plastic pail.
9. One pair goggles.
10. One MSDS.

B. Scavenger Cleanup Kit (raw material 4934)

1. One Plastic pail with cover.
2. One pair goggles.
3. One MSDS.
4. Three rope polypigs.
5. Five wiper pads.
6. One pair green nitrile gloves.
7. One gallon oil dry.

C. General Spill Kit

1. One 55 gallon drum #c15506.
2. Four Disposable TYVEK Suits (XXLarge or XXXLarge)
3. Three Polyrope Pigs for Damming Spills.
4. Three boxes Leak Seal for Drums.
5. One pack Sorbx2 pads.
6. One roll Disposable Boots
7. Eight HMIS Stickers
8. Four pairs Neoprene or Nitrile Gloves
9. One mop head with Handle.
10. One plastic scoop.
11. One bag Oil Dry.
12. One Mop Bucket/Ringer with Mop.
13. Two pairs Goggles

D. Blood Decontamination Kit (Purchased from Respond).

EP-031 MONTHLY AST INSPECTION CHECKLIST

General Inspection Information:

Inspection Date:_____ Retain Until Date:_____
(36 months from inspection date)

Inspectors Name:_____

Containers Inspected (ID#'s):_____

Inspection Guidance:

Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Note the non-conformance and corresponding corrective action in the comment section.

In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.

Item	Status	Comments
1.0 Tank Containment		
1.1 Water in primary tank, secondary containment, interstice, or spill container?	☐ Yes* ☐ No	
1.2 Debris or fire hazard in containment?	☐ Yes* ☐ No	
1.3 Drain valves operable and in a closed position?	☐ Yes ☐ No*	
1.4 Containment egress pathways clear and gates/doors operable?	☐ Yes ☐ No*	
2.0 Leak Detection		
2.1 Visible signs of leakage around the tank, concrete pad, containment, ring wall or ground?	☐ Yes* ☐ No	
3.0 Tank Attachments and Appurtances		
3.1 Ladder and platform structure secure with no sign of severe corrosion or damage?	☐ Yes ☐ No*	
3.2 Tank liquid level gauge readable and in good condition?	☐ Yes ☐ No*	
3.3 Check all tank openings are properly sealed	☐ Yes ☐ No*	
4.0 Other Conditions		
4.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?	☐ Yes* ☐ No	

Additional Comments:_____

EP-031 ANNUAL AST INSPECTION CHECKLIST

General Inspection Information:

Inspection Date:_____ Retain Until Date:_____
(36 months from inspection date)

Inspectors Name:_____

Containers Inspected (ID#'s):_____

Inspection Guidance:

For equipment not included in this standard, follow the manufacturer recommended inspection/testing schedules and procedures.

The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.

Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for Paint Failure.

Concrete containment structures and tank foundations/supports including examination for holes, washout, settling, cracking, and for paint failure, in addition to corrosion and leakage.

Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.

Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.

Remove promptly upon discovery of standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.

In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to insure proper operation (40 CFR 112.8(c)(8)(v)).

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a certified inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklist for 36 months.

Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklist.

Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

Item	Status	Comments
1.0 Tank Containment		
1.1 Containment structure in satisfactory condition?	☐ Yes ☐ No*	
1.2 Drainage pipes/valves fit for continued service?	☐ Yes ☐ No* ☐ N/A	
2.0 Tank Foundation and Supports		
2.1 Evidence of tank settlement or foundation washout?	☐ Yes* ☐ No	
2.2 Cracking or spalling of concrete pad or ring wall?	☐ Yes* ☐ No	
2.3 Tank supports in satisfactory condition?	☐ Yes ☐ No*	
2.4 Water able to drain away from tank?	☐ Yes ☐ No*	
2.5 Grounding strap secured and in good condition?	☐ Yes ☐ No*	
3.0 Cathodic Protection		
3.1 CP system functional?	☐ Yes ☐ No* ☐ N/A	
3.2 Rectifier reading:		
4.0 Tank External Coating		
4.1 Evidence of paint failure?	☐ Yes* ☐ No	
5.0 Tank Shell/Heads		
5.1 Noticeable shell/head distortions, buckling, denting or bulging?	☐ Yes* ☐ No	
5.2 Evidence of shell/head corrosion or cracking?	☐ Yes* ☐ No	
6.0 Tank Manways, Piping and Equipment within Secondary Containment		
6.1 Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	☐ Yes ☐ No*	
7.0 Tank roof		
7.1 Standing water on roof?	☐ Yes* ☐ No	
7.2 Evidence of coating cracking, crazing, peeling, blistering?	☐ Yes* ☐ No	
7.3 Holes in roof?	☐ Yes* ☐ No	
8.0 Venting		
8.1 Vents free of obstructions?	☐ Yes ☐ No*	
8.2 Emergency vent operable? Lift as required?	☐ Yes ☐ No*	
9.0 Insulated Tanks		
9.1 Insulation missing?	☐ Yes* ☐ No	

Item	Status	Comments
9.2 Are there noticeable areas of moisture on the insulation?	☐ Yes* ☐ No	
9.3 Mold on insulation?	☐ Yes* ☐ No	
9.4 Insulation exhibiting damage?	☐ Yes* ☐ No	
9.5 Is the insulation sufficiently protected from water intrusion?	☐ Yes ☐ No*	
10.0 Level and Overfill Prevention Instrumentation of Shop-Fabricated Tanks		
10.1 Has the tank liquid level sensing device been tested to ensure proper operation?	☐ Yes ☐ No*	
10.2 Does the tank liquid level sensing device operate as required?	☐ Yes ☐ No*	
10.3 Are overfill prevention devices in proper working condition?	☐ Yes ☐ No* ☐ N/A	
11.0 Electrical Equipment		
11.1 Are tank grounding lines in good condition?	☐ Yes ☐ No* ☐ N/A	
11.2 Is electrical wiring for control boxes/lights in good condition?	☐ Yes ☐ No* ☐ N/A	

Additional Comments:

AREAS INSPECTED: Check Box for All Areas Inspected

R&D		QC		Milling Paste Area		Milling Surge Tank	
Filling Nuepac Line		Filling Qt Line		Utility	X		

Circle the desired Answer:

1.	"Satellite Waste Accumulation Area" signs posted at all collection points?	Yes	No	N/A
2.	Containers:			
a.	Hazardous Waste label, including contents?	Yes	No	N/A
b.	Good condition, no leaks, no excess material on lids or sides, no dents?	Yes	No	N/A
c.	Compatible with waste contained?	Yes	No	N/A
d.	Closed when not in use?	Yes	No	N/A
e.	At or near the point of generation?	Yes	No	N/A
f.	Moved to storage within 24 hours of filling?	Yes	No	N/A
g.	Adequate aisle space (24" minimum)	Yes	No	N/A
h.	Less than 55 gallons of all waste streams?	Yes	No	N/A
3.	Adequate spill response equipment available?	Yes	No	N/A
4.	Emergency communication device available with posted information?	Yes	No	N/A

Note: If "NO" is circled, corrective action must be taken, and noted below.

COMMENTS: _____

_____

_____

1. Containers must be in good condition, closed and sealed.
2. A maximum of 55 gallons of all hazardous wastes may be accumulated at a Satellite Accumulation area. This includes all hazardous waste streams located in the satellite area
3. Check container for evidence of leakage, corrosion or deterioration. If a container is not in good condition or begins to leak, the Hazardous Waste in the container shall be transferred to a container in good condition. Any leakage noted must be acted on immediately.
4. The container must be dated when it becomes full. Dated, full hazardous waste containers in this area should not be more than 1 day old.
5. Empty space must be provided around containers to adequately verify they are not leaking and provide access in the event of an emergency.

COMPLETED BY: _____ DATE: _____

SIGNATURE: _____